



Federal Communications Commission
7435 Oakland Mills Road
Columbia, Maryland 21046
USA

January 17th, 2025

Ref: FCC Class II Permissive change for FCC ID: PD9BE201D2

Dear Examiner,

This is to request a Class II permissive change for module approval FCC ID: PD9BE201D2, originally granted on 03/29/2024 and for the subsequent permissive change(s) on 06/20/2024 (portable SAR), 07/08/2024 (SAR SKU 8mm).

Change #1: This change establishes portable category SAR conditions for the Lenovo model ThinkPad X9-15 Gen 1 regular notebook with PIFA antenna(s) part number(s) DC330025D00, DC330025B00.

Note(s):

- The WLAN TAS feature is enabled on 2.4GHz and 5GHz band. The exact same WLAN authorized modules are reused in this notebook with the exact same TAS algorithm validation methods for time averaging SAR as approved by FCC.
- For the listed antennas. The PC systems categorized as portable regarding FCC Part 2.1093 and IC RSS-102 chapter 3 satisfies the conditions based on modular stand-alone SAR evaluation with 8mm antenna to user separation distance.

Yours Sincerely,

Benjamin Lavenant
Wireless regulatory Engineer
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SAS au capital de 5 208 026,16 Euros – RCS Nanterre 302 456 199 – Siret 302 456 199 00256 - TVA FR54302456199