



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

January 25th, 2025

Ref: FCC Class II Permissive change for FCC ID: PD9BE201NG

Dear Examiner,

This is to request a Class II permissive change for module approval FCC ID: PD9BE201NG, originally granted on 03/13/2024 under mobile configuration and on 05/06/2024 under portable configuration.

Change #1: This change establishes portable category SAR conditions for the Dell model P138F Convertible PC with antennas part number AYF6Y-100247, AYF6Y-100248

- 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.
- The device support the Dynamic SAR feature using G/Hall sensors previously approved under PAG item TXSENS.
- The IPD measurement is conducted on a single channel instead of the five channels permitted by the FCC upon inquiry shared on this filing.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Benjamin Lavenant", with a stylized flourish at the end.

Benjamin Lavenant
Wireless regulatory Engineer
Intel Corporation

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