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September 2, 2008

FCC ID: PD9LEN512ANMU  
Canada UPN: 1000M-L512ANMU

To whom it may concern:

The enclosed documents constitute a formal submittal and application for a Class II Permissive change / Reassessment for a U-NII/DTS wireless LAN module pursuant to the following rules:

Subpart E of Part 15 of FCC Rules (CFR 47) , UNII Devices  
RSS-210, Issue 7, June 2007, “Low-power Licence-exempt Radiocommunication  
Devices (All Frequency Bands): Category I Equipment”

The module was approved under three separate rule parts – DTS (2.4GHz and 5.7GHz bands), NII (5250-5250, 5250-5350 and 5470-5725 MHz bands) and JBP (PC peripheral).

The proposed change is to add a new antenna set, Amphenol part numbers 14G152168231LV for the main antenna and 14G152168131LV for the Aux antenna. The new antenna is based on a PIFA design (similar to the Universe technology antenna previously approved) but is described as a Coupling Antenna & Carrier.

| Antenna Name and model   | Type             | Antenna Gain   |              |              |              | Comments           |
|--|------------------|----------------|--------------|--------------|--------------|--------------------|
|  |                  | 2.4GHz         | 5.2GHz       | 5.5GHz       | 5.7GHz       |                    |
| Ethertronics MPCI-8  | Magnetic Dipole  | 3.0            | 5.0          | 5.0          | 5.0          | Original Antenna   |
| Universe Technology PIFA   | PIFA             | 3.24           | 3.73         | 4.77         | 4.97         | Original Antenna   |
| Amphenol WLAN PIFA<br>Main: 14G152168231LV;<br>WLAN Aux: 14G152168131LV; | Coupling Antenna | -0.59-<br>1.00 | 1.36<br>0.01 | 2.18<br>2.19 | 1.64<br>2.76 | <b>New Antenna</b> |

As the new antenna is a different type of antenna to the antennas previously approved testing for radiated spurious emissions has been performed in both DTS and all three NII operating bands. The worst case mode(s) for spurious emissions at the band edges (for bands adjacent to restricted bands) and spurious emissions at other frequencies were evaluated with the new antenna type, with the worst case determined by results of previous testing with the PIFA antenna.

As this is a request for a Permissive Change / Reassessment the only documents being uploaded are the application forms, test report, rf exposure calculation and antenna information. All other documents originally uploaded remain unchanged. American TCB handled the original Industry Canada assessment and should have all the relevant documents on file covering operation in the other bands. Please advise if any of the previous documentation is required to allow you to complete this re-assessment.

Although the MPE calculation remains unchanged (the highest antenna gain in all bands is one of the original antennas - either the Universe PIFA or the Ethertronics magnetic Dipole) the calculation and RSS-102 form have been uploaded to explain that this is the case.

Elliott Laboratories, as duly authorized agent prepared this submittal. A copy of the letter of our appointment as agent is included with the application.

If there are any questions or if further information is needed, please contact Elliott Laboratories for assistance.

Sincerely,



Mark Briggs  
Staff Engineer

MB/dmg