



Qualcomm Technologies, Inc.
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5/12/2020

To Whom It May Concern:

We, Qualcomm Atheros, Inc. hereby apply for Class II Permission Change to the approved product under FCC ID: **PPD-QCNFA435** (Class 4 Permission change to IC: **4104A-QCNFA435**), to portable category when applied in the **Dell** computer model **P102F**. Due to the below 20cm separation distance to human body of the host design, we have tested the platform with the FCC ID: **PPD-QCNFA435** (IC: **4104A-QCNFA435**) device for SAR. Radiated emission testing was not additionally performed due to the following reasons:

- The product peak with FCC ID: **PPD-QCNFA435** (IC: **4104A-QCNFA435**) module was assessed compliant to radiated emission limits per 15.247 and 15.407 in its initial FCC approval, and RSS-247 in its initial IC approval.
- The host design employed antennas of lower gains than the originally approved in all bands of intentional transmission. Hence intentional and spurious radiated emissions are expected to be lower than what were measured in the original modular approval.

Please kindly review the application documents submitted and grant approval for this Permissive Change application.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Caroline Yu".

Caroline Yu

Qualcomm Technologies Inc.