

Justification Letter

Date: February 12, 2018

To Whom It May Concern:

We, hereby apply for Class II permission change to the approved product under FCC ID: TX2-RTL8821CE (IC: 6317A-RTL8821CE), to portable category when applied in the laptop platform, Model Name:

Lenovo ideapad 330S-15IKB, 81F5; Lenovo ideapad 330S-15AST, 81F9; Lenovo ideapad 330S-

15ARR, 81FB due to the design of the platform resulting in less than 20 cm distance to human body, we have tested the platform with the FCC ID: TX2-RTL8821CE (IC: 6317A-RTL8821CE) device for SAR. Radiated emission testing was not additionally performed due to the following:

- The product with FCC ID: TX2-RTL8821CE (IC: 6317A-RTL8821CE) module was assessed compliant to radiated emission limits per 15.247 and 15.407 in its initial FCC approval, and RSS-247 issue 2 in its initial IC approval.
- The product with FCC ID: TX2-RTL8821CE (IC: 6317A-RTL8821CE) module was assessed compliant to DFS limits per 15.407 in its initial FCC approval, and RSS-247 issue 2 in its initial IC approval.
- The host antenna is designed for a lower peak gain in the intentional transmit frequency bands and therefore radiated performance in the intentional frequency bands is expected to be lower than that measured in the original modular approval.

Please kindly review the application documents submitted and grant approval for this permissive change application.



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