

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia MD 21046  
Date: September 20, 2018

Subject: Requesting Class II permissive change for FCC ID: ZMOL850GL

To Whom It May Concern:

The purpose of this letter is to request a Class II Permissive change for FCC ID: ZMOL850GL, original granted on 03/10/2017.

Applicant: Fibocom Wireless Inc.

**A. DESCRIPTION OF PRODUCT CHANGES,**

- a. The subject approved module is being used in different host (Portable category Configuration, Host Brand/Model: IdeaPad Duet 3 10IGL5-LTE;
- b. Disable LTE Band 38 by software.
- c. Change antenna (maximum antenna gain less than original grant).

**B. PERFORMANCE DIFFERENCES:**

Description	Re-testing item	Remark
ERP/EIRP/Radiated spurious emission	No need	The Original FCC testing on module under FCC ID: ZMOL850GL was performed with antenna of higher gain, and the antenna was connected to the modular in an open environment. The current host platform under application uses an antenna lower gain and is installed inside the host platform enclosure. The physical restraints introduced by the host platform should have resulted in equal or lower level of ERP/EIRP/Radiated spurious emission. Therefore additional ERP/EIRP/Radiated spurious emission testing is not necessary.
SAR	Need testing	<ol style="list-style-type: none"><li>a. Measured SAR at cellular with new host</li><li>b. There is WLAN/BT module integrated in this host. The module is Intel 9560D2W R, supports 2.4GHz/5GHz WLAN and dual mode Bluetooth;</li></ol>
External Photos	Provided	Provided host device IdeaPad Duet 3 10IGL5
Internal Photos	No need	

SAR Test Setup      Provided  
Photos

**C. CONCLUSION:**

This radio continues to meet all FCC standard requirements, including RF Exposure, thus this change does meet requirements a Class II Permissive Change.

Sincerely,  
Best Regards

Lucy Liu  
Lucy Liu