

To whom it may concern:

This is a new certification application of a device that contains cellular module Sierra HL7810, which is currently approved under FCC ID N7NHL78A and IC: 2417C-HL78A. Although originally certified with an eSIM on board, Sierra offers a version of this module that contains no eSIM. Sierra has done the necessary due diligence to determine that the version with no eSIM falls under the classification of a class 1 permissive change that has no effect on the RF behavior of the device. The version with no eSIM is the one that we are using.

No modifications are being made to the module that we are purchasing from Sierra and all guidance specified in the modular approval grant is met except for the 2dBi maximum antenna gain. Given that the antenna (Taoglas PCS.66.A) falls outside of the maximum 2dBi gain specified in the grant, we are requesting this new certification in accordance with KDB 996369 D02 Module Q and A v02.

Included in this filing are the following items as specified in KDB 996369 D02 Module Q and A v002:

- Relevant test reports from the original module filing. These test reports accurately represent test results under the new conditions:
 - o Part 22 test report for module FCC ID N7NHL78
 - o Part 24 test report for module FCC ID N7NHL78
 - o Part 27 test report for module FCC ID N7NHL78 (split into two documents due to size)
- Spurious emissions measurements of the HL7810 using the Taoglas PCS.66.A
- Updated MPE evaluation

All reported fundamental power levels in this filing were calculated using the reported power levels from the module's grant and the gain of the Taoglas PCS.66A antenna at the associated frequencies.

Regards,



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