Attn: Director of Certification

Cover letter regarding Class II Permissive Change application for FCC ID: 2AGVY-100MWBXX01

The applicant is seeking approval for a Class II Permissive Change allowing the use of a radio module with FCC ID: 2AGVY-100MWBXX01 in a new host product (a tablet) for which the RF Exposure separation distance needs to be reduced to 0 cm from the host enclosure. Also, the new host will use different antennas than what is specified for use in the current grant notes. There are three different models of the host, one for portable use, one for desktop use, and the third to be mounted on a wall. A SAR test report is included for the portable model, and MPE reports are included for all three models.

To ensure compliance with SAR limits, power reductions were implemented in the device firmware. Firmware version AG100.025 introduced the capability for WRDS (Wireless Regulatory Domain Select) settings in BIOS, but did not configure specific values. The current firmware version AG100.030 implements the correct power values, which cannot be changed by end-users. These power reductions affect the 2.4 GHz and 5 GHz Wi-Fi bands, with output power now limited to the values shown in the SAR report. This adjustment ensures that the device operates within the SAR limits while maintaining optimal performance for its intended use. These firmware changes are permanent and cannot be altered by end-users, ensuring continued compliance with FCC regulations throughout the device's lifecycle.

Also, the host product will not support 160 MHz bandwidth channels, such as channel 50 centered at 5250 MHz.

A Radiated Spurious Emissions (RSE) report is also included due to the antenna change. Please note that when the RSE testing was done, the same antenna (Pulse W3006) was used for both the Main and Aux antennas. After that testing, the Aux antenna was changed to a similar antenna but with lower gains (Pulse W3095). This accounts for the difference in the antenna information between the RSE test report and the SAR and MPE reports. So basically, the RSE was over-tested with a higher gain Aux antenna than the final configuration.

Sincerely,

Martin Taylor
Agent for Aegex Technologies LLC
SGS North America
Title: RF/EMC Engineer
Date: 20 September 2024