Federal Communications Commission 7435 Oakland Mills Road Columbia MD 21046

C.C.: Telefication B.V., Dept. FCC TCB Edisonstraat 12A 6902 PK ZEVENAAR The Netherlands

Subject: Requesting Class II permissive change for FCC ID: RWO-RZ090368 To Whom It May Concern:

The purpose of this letter is to request a Class II Permissive change for FCC ID: RWO-RZ090368, original granted on 12/30/2020

The major change field under this application is:

- 1. The subject approved module is being used in a portable configuration- a Notebook (Brand name/Model: RAZER/ RZ09-0409), the distance between antenna and human body is 0 mm and the original module report the distance is 13 mm. SAR testing was performed to demonstrate RF compliance.
- 2. The difference compared with the original module design is antenna change. Two groups antennas are used for the subject approved module in the Notebook Computer as below listed.

ANTENNA INFORMATION			
ANTENNA DESCRIPTION	GAIN (dBi) or Integral		
SkyCross reference Antenna			
Type PIFA			
2400-2484 MHz	3.24 dBi		
5150-5250 MHz	3.64 dBi		
5250-5350 MHz	3.73 dBi		
5470-5725 MHz	4.77 dBi		
5725-5850 MHz	4.97 dBi		

Original module:

Antenna Gain (dBi)	Brand	Main Antenna (Ant A)	Aux Antenna (Ant B)
	Bluetooth	3.22	/
	WLAN 2.4G	3.22	3.11
	WLAN 5.2G	3.01	3.15
	WLAN 5.3G	3.71	3.50
	WLAN 5.6G	4.07	3.65
	WLAN 5.8G	4.04	3.68

Notebook : Antenna Type : Main Antenna / Aux Antenna : PIFA

- 3. For the Notebook , since it is client without DFS radar detection capability, detection threshold as set to the module remains identical, and would deactivate the link as it is operated with AP only, DFS test can be excluded.
- 4. Reduce the Output Power through software, and SAR measurement was evaluated.

Please contact me if you have any questions or need further information regarding this application.

**Best Regards** 

Name: Johnsen Tia Title:Senior Director, Regulatory & Compliance Date: 2021-05-24