Razer Inc.

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-RZ090310
To Whom It May Concern:

The purpose of this letter is to request a Class II Permissive change for
FCC ID: RWO-RZ090310, original granted on 07/15/2019.

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/RZ09-031, RZ09-0310), the distance between antenna and human body is 0mm and the original module report the distance is 17mm. SAR testing was performed to demonstrate RF compliance.

2. Addition two antennas, the antenna type is same, the antenna gain is shown as below:

Original module:

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

Notebook :

Ant.	Type	Antenna Mfr.	Antenna Gain (dBi)	Note
1	PIFA	ATC	2.56	2.4G
			4.26	5G UNII-1
			4.24	5G UNII-2A
			4.49	5G UNII-2C
			4.6	5G UII-3

2	PIFA		2.44	2.4G
			4.99	5G UNII-1
			4.99	5G UNII-2A
			4.57	5G UNII-2C
			4.49	5G UII-3

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: Director, Regulatory & Compliance
Date: 2019/08/01
Signed: