Federal Communications Commission
7435 Oakland Mills Road
Columbia MD 21046

Date: June 22, 2018

Subject: Requesting Class II permissive change for FCC ID: N7NEM7455

To Whom It May Concern:

The purpose of this letter is to request a Class II Permissive change for FCC ID: N7NEM7455, original granted on 07/28/ 2015.

Applicant: Sierra Wireless Inc.

A. DESCRIPTION OF PRODUCT CHANGES,

a. The subject approved module is being used in different host (Portable category Configuration, Host Brand/Model: Lenovo MIIX 320-10ICR;
b. Disable LTE Band 30 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	a. The Original FCC testing on module under FCC ID: N7NEM7455 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	a. Measured SAR at cellular with new host.

		b. There are two WLAN/BT modules integrated in this host. One is Intel 31652D2W, the other is Intel 8265D2W; c. For Intel 31652D2W, the 2.4GHz/5GHz WLAN and Bluetooth SAR results are referenced from the report of FCC ID: PD931652D2 (Intel internal report no. SAR.20170107), and these SAR results are also used to perform simultaneous transmission analysis. d. For Intel 8265D2W, the 2.4GHz/5GHz WLAN and Bluetooth SAR results are referenced from the report of FCC ID: PD98265D2 (Intel internal report no. SAR.20170108), and these SAR results are also used to perform simultaneous transmission analysis.
External Photos	Provided	a. Provided host device Lenovo MIIX 320-10ICR
Internal Photos	No Need	
SAR Test Setup Photos	Provided	

d. 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

Mandy Wang (agent)