



GE Healthcare

Subject: Cover letter - C2PC request for the FCC ID 2A08L-WL18DBMOD

Date: October 31, 2022

To: Federal Communications Commission
7435 Oakland Mills Road
Columbia, Maryland 21046
USA

GE Healthcare requests a Class II Permissive Change (C2PC) to the FCC ID 2A08L-WL18DBMOD to allow the Bluetooth Low Energy (BLE) operation with the module. All Bluetooth operation was earlier excluded from the module ID. The following changes have been made compared to the BLE operation in the original TI module (FCC ID Z64-WL18DBMOD):

Use with co-located transmitters:

In the GE host product (meaning identical HW Portrait HUB01 and HUBXB), the WLAN/BT module is located inside the same mechanics with the Medical Body Area Network (MBAN), Near Field Communication (NFC) and Radio Frequency Identification (RFID) transceivers. The C2PC is justified as the retesting shows that the applicable FCC part 15 requirements are met in the GE host device with all the radios active simultaneously.

Use in a portable host device:

The Portrait HUB01/HUBXB is a body-worn devices and thus categorized as a portable device (not a mobile device as defined in the original TI grant). The C2PC is justified as the Portrait HUB01/HUBXB has undergone a SAR evaluation for the portable device and it complies with the requirements of the FCC part 2.1093.

New integrated GE custom antenna:

The GE custom antenna in the Portrait HUB01/HUBXB is used for the BLE:

- Max gain +6.0 dBi @ 2400-2483.5 MHz (the same top antenna is used for both the WLAN and Bluetooth)

The C2PC is justified as the GE custom antenna is characterized and the retesting shows that the applicable FCC part 15 requirements are met in the GE host device (HUB01/HUBXB).

This C2PC does not cover the Bluetooth Classic mode (BR/EDR) as that mode is disabled in the GE host device. A separate C2PC will be submitted if that mode is enabled in future product releases.

In the case of any questions please feel free to contact me.

Sincerely,

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