



February 26th, 2020

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Re: Class II Permissive Change Request

To Whom It May Concern,

Enclosed please find an application for a Class II Permissive Change certification of Equipment Model **471-0009-01**, FCC ID: **2AVRK-CC3200WFD**, under Rule Part FCC 15.247.

Athena GTX is requesting use of the same module (exactly equivalent to FCC ID: **2AVRK-CC3200WFD**) within 20 cm of the body; which may be safely done based on the information provided below:

Frequency Range	Output Power	Duty Cycle*	Antenna Gain
2.4 GHz (2412-2462 MHz)	14.64 dBm	1.3ms to 6.5ms (<1%)	-0.2dBi
<i>*If the duty cycle is less than 100%, provide a justification. Consider, during normal operation, what is the maximum possible duty cycle for transmission in any portion of the band during any 6-minute period?</i>			
Device transmits up to 9000 bytes per sec. Data rate assumed is (b) 11 Mbps or (g/n)54 Mbps.			

The standalone 802.11 b/g/n radio will be used with a right angle whip antenna in Athena GTX's Wireless Vital Signs Monitor (WVSM). The WVSM is intended to be used as an adult patient monitor, indicated as a single or multi-parameter monitor for ECG, noninvasive blood pressure, and SpO₂. The monitor uses wireless communications to transmit vital sign data to a mobile device or personal computer.

No document changes from the original application are necessary, but testing performed by Element Materials Technology has also been included. If you have any questions regarding this application, please feel free to contact me.

Sincerely,

Sean Mahoney

Vice President of Operations and Regulatory Affairs, Athena GTX