



May 10th, 2024

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
2.4 GHz (2412-2462 MHz)
<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>
The device transmits the following data per second for each radio mode standard at their minimum transmission rates (The radio sends no beacon signals): <ul style="list-style-type: none">• 802.11b: 7,659 bytes per (1) second which is ~6.13 % at 1Mb/s.• 802.11g: 7,659 bytes per (1) second which is ~1.02 % at 6Mb/s.• 802.11n: 7,659 bytes per (1) second which is ~0.94 % at 6.5Mb/s.

The standalone 802.11 b/g/n radio will be used with a whip, right angle, RP-SMA connector, 2.35GHz ~ 2.5GHz, 0.2dBi gain RF antenna in Athena GTX's Wireless Vital Sign Monitor Professional WVSM Pro (Series) family of devices. The WVSM Pro (Series) is intended to be used as a single patient multi-parameter monitor including SpO2, NIBP, ECG, Capnography, and Temperature. The monitor uses wireless communications to transmit data to a mobile device or personal computer.

No documents 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