

2019 November 5

Federal Communications Commission  
Authorization and Evaluation Division  
7435 Oakland Mills Road  
Columbia, MD 21046

Attn: OET Dept

RE: Request for Class II permissive change for FCC ID: IPH-03346

Dear Examiner,

We would like to request a Class II permissive change for FCC ID: IPH-03346 on behalf of Garmin International. The device currently features firmware that disables the 24 GHz radar whenever an accelerometer detects motion from the device in order to prevent the user from being within 20 cm when the 24 GHz radar is operating.

In order to improve the user experience, Garmin would like to disable this firmware feature. We have provided the FCC an RF exposure evaluation based on calculations from design specifications and maximum available power through the KDB system and have received authorization to state that this device is exempt from SAR testing requirements in a portable application (KDB tracking number [REDACTED])

We have provided an updated Operation Description which removes the description of this firmware feature and we would like the following grant comment removed:

“This device ceases operation upon detection of physical motion, as detailed in the filing”

Please let me know if you have any questions.



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