

October 8, 2008

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

Re: Application for Cellular and PCS Transceiver Class 2 Permissive Change

Qualcomm Incorporated herein submits the Application for Equipment Authorization (FCC Form 731) and Exhibits for a Class 2 Permissive Change of a Cellular & PCS Transceiver, FCC ID: J9CINGE02.

Applicant: Qualcomm Incorporated
5775 Morehouse Drive
San Diego, CA 92121

Manufacturer: ZTEMT
5/F, South Tower
Wondial Building, No.29
6th South Keji Road
Hi-Tech Industrial Park
Nanshan District
Shenzhen, China

The inGeo1 AW device is a dedicated Human Tracking Terminal (HTT). It is targeted for toddlers, school age children, elderly and other users that need or desired to be tracked. While CDMA2000 1X compliant, the HTT design is optimized for minimal cost, minimal size, maximum battery life and superb position location performance. The device uses A-GPS to obtain position location and sends this information back to the network by SMS data packets. The inGeo1 AW device incorporates internal antennas for both WWAN and GPS.

This Class 2 Permissive Change is requested because the body worn holster is now available.

Please contact me at Tel: (858) 658-5838 or Email: rscodell@qualcomm.com, if there are any questions or additional information needed.

Sincerely,

Robert Scodellaro

Robert Scodellaro
Engineer, Senior Staff Manager
Qualcomm Incorporated