1) Based on previous filings under this FCC ID, this device has a Limited Modular Approval for use in mobile and fixed RF exposure conditions. Cover letter to present filing says: "FreeWave seeks to add portable authority to the authorization, for which it presently has only mobile authority. In support of its application, FreeWave is attaching an SAR evaluation." Please note that FCC does not have provisions for general Modular Approvals for use in portable RF exposure conditions. Some filings have approved devices under Limited Modular Approval and including SAR evaluations in specific host products, where Class II permissive change filings are usually done if module is used with different host products and antennas in portable exposure conditions. Please describe intended uses for this module based on this filing.

Our request for a class II permissive change is limited to operation of the module in a portable mode while incorporated within the device that was used in the SAR testing. We acknowledge that we must conduct additional SAR tests, and must file additional permissive change applications, if we want authority for the module to be operated in a portable mode while incorporated within any other device.

2) Please provide antenna(s) description/specification, including whether specific antenna(s) were tested and in which previous filing(s) under this FCC ID.

The antenna used is manufactured by Antenex, model number DEXC902KR. It is a 1/4 wave whip, unity gain antenna, 902-960 MHz, with a 5/16 x 32 3/8 inch diameter KR connector. Although this antenna was not tested in connection with previous filings under this FCC ID, several antennas that were tested, and for which test results were submitted, are of the same type, and have the same directional gain (0 dB), as the Antenex DEXC902KR. See page 2 of the report of 'external photos antennas' on the following link:

https://gullfoss2.fcc.gov/prod/oet/cf/eas/reports/ViewExhibitReport.cfm?mode=Exhibits&RequestTimeout=500&calledFromFrame=N&application_id=603469&fcc_id='KNY-6231812519'

3) Please submit internal photos or sketches showing antenna(s) and location(s) relative to housing.

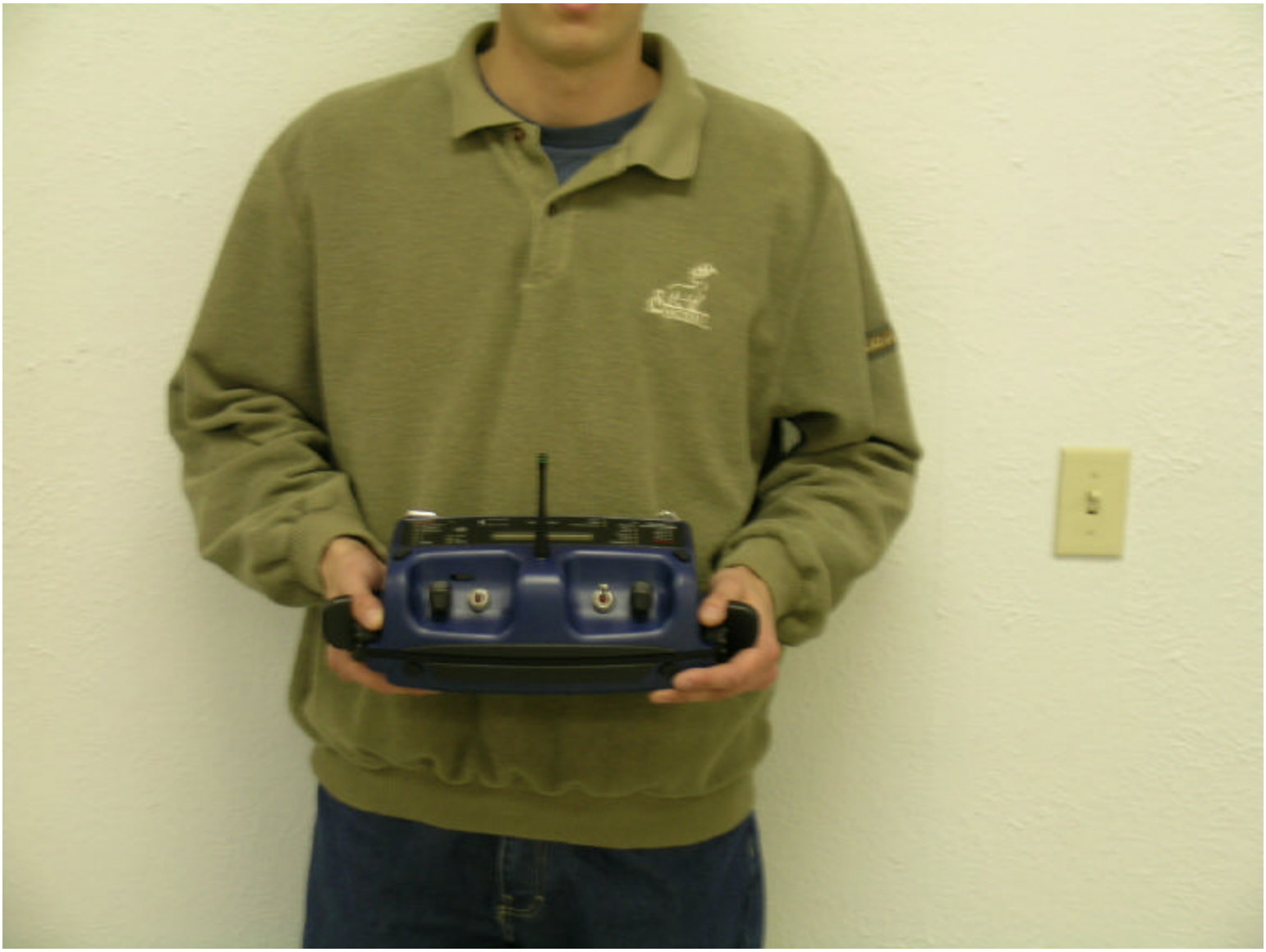
Photos are attached.

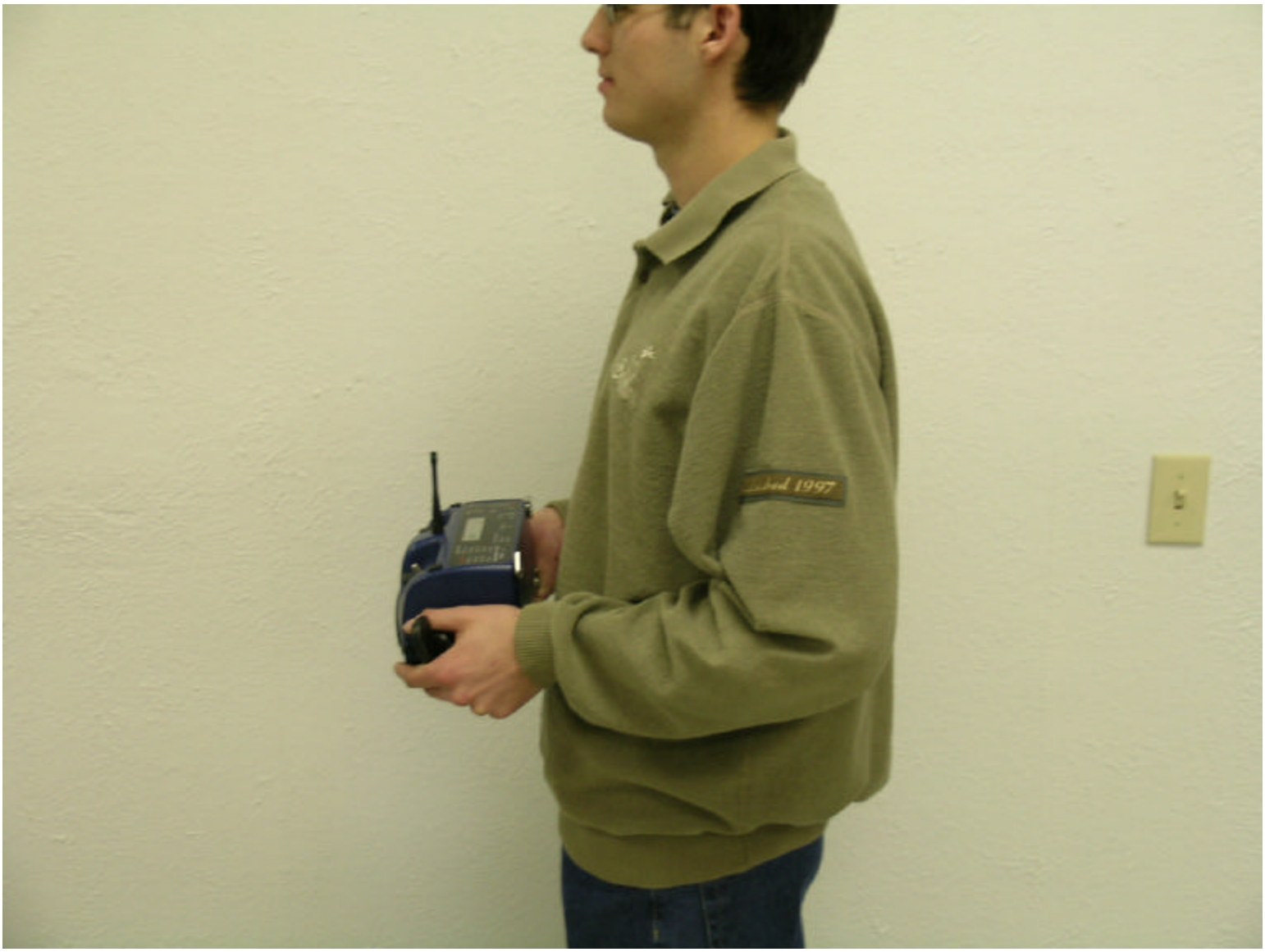
4) Form731 output power is 955 mW. Please describe any device source-based time-averaging duty factors, and/or provide measured average power, to support RF exposure evaluations.

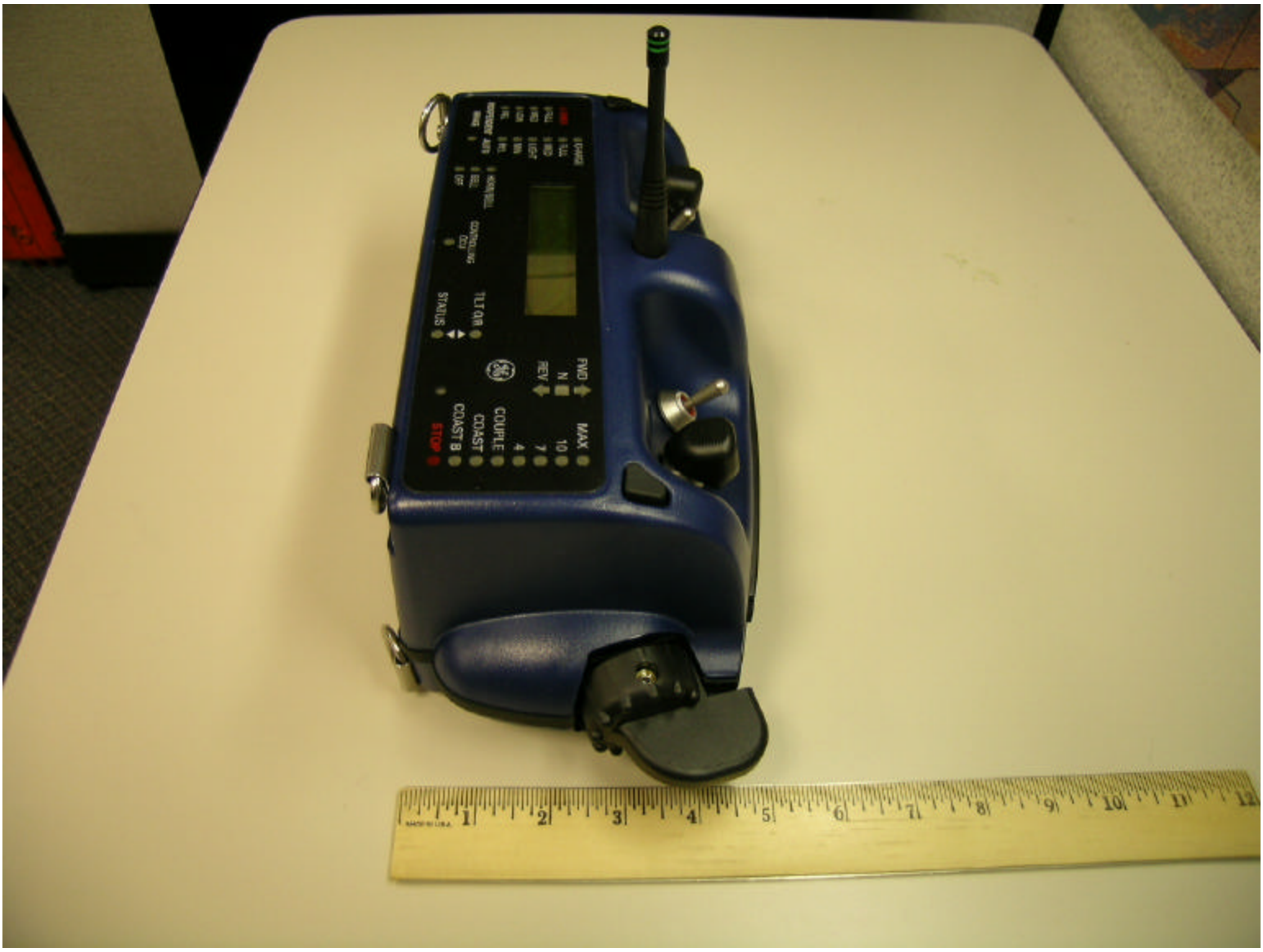
The unit was tested for SAR compliance with a peak power of 955mW. The EUT was operating at a 10% duty cycle during the SAR test, making for an average power of 95.5mW. These test conditions are representative of actual operations, during which a duty cycle of 10% or less will be employed.

5) Please provide more details and/or photos of SAR test setup - pg 22 of SAR report .pdf appears to show stub antenna not seen in any other photos. Please clarify and/or revise.

The test setup on p. 22 of the report shows the device with the antenna attached as it will be used. Other pictures previously submitted showing the device and its relative position to the body did not have the antenna attached. Updated pictures showing the device with the antenna attached are included with this response.



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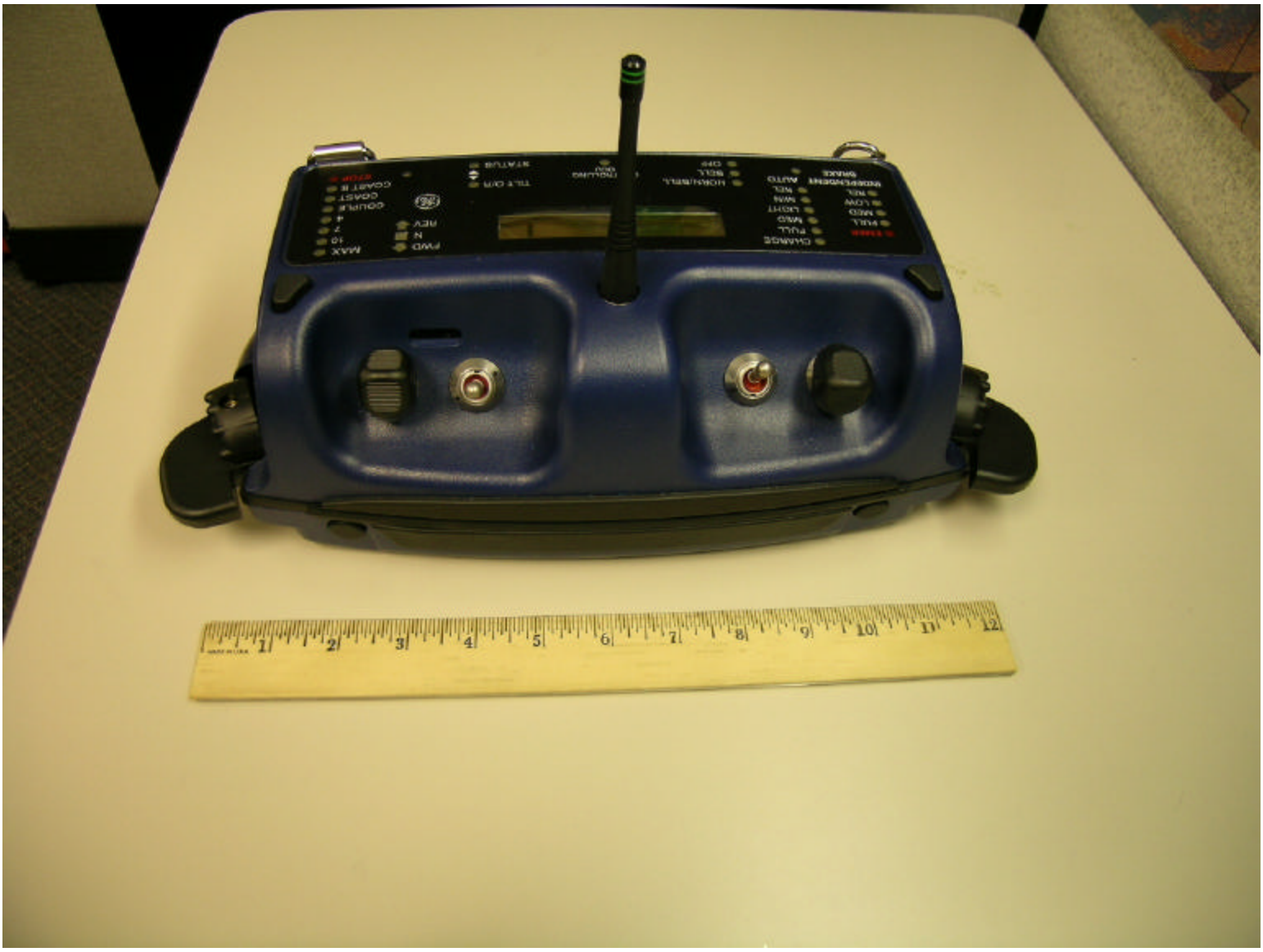

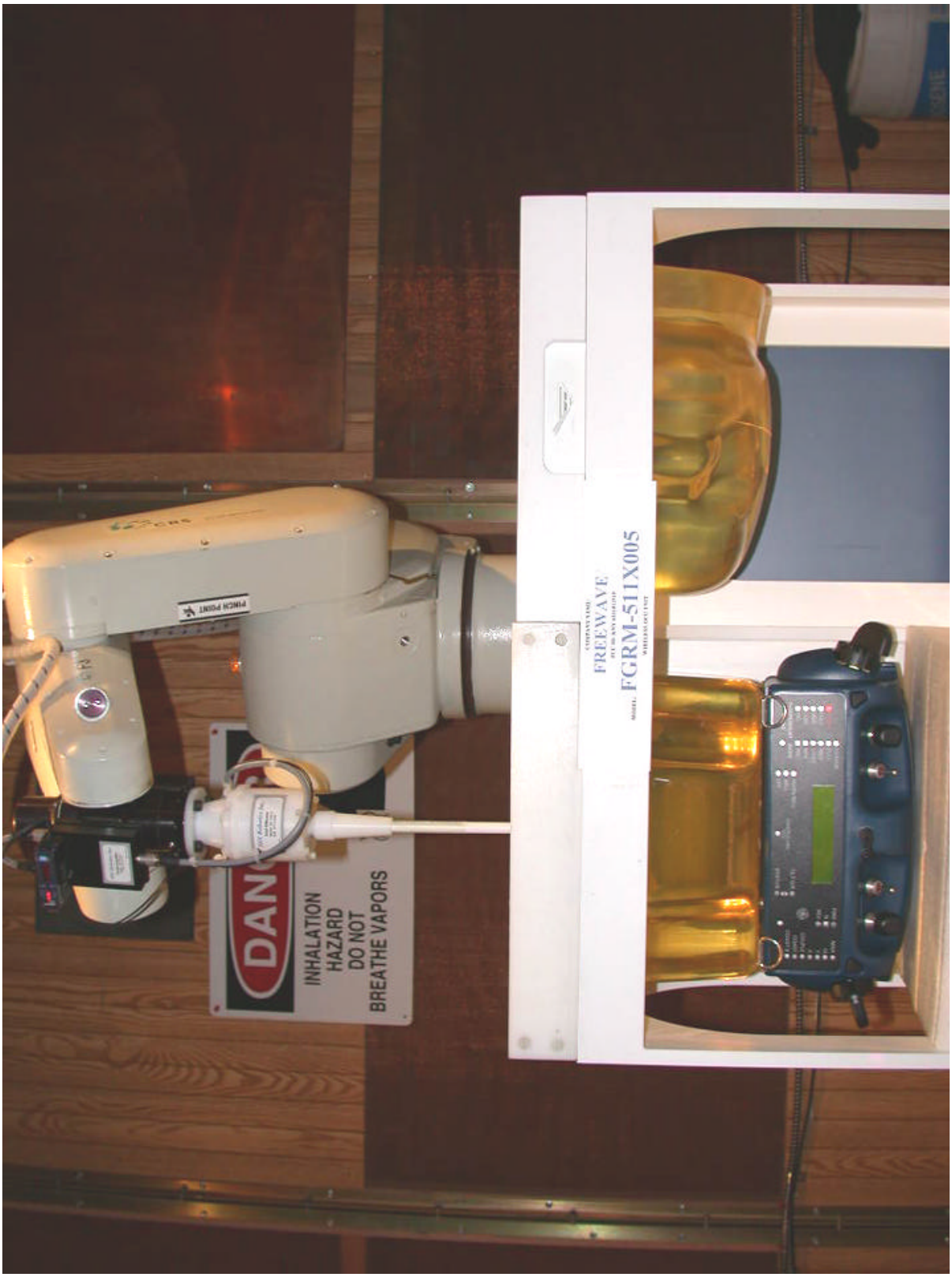
FREEWAVE
FGRM-511X005
INHALATION
HAZARD
DO NOT
BREATHE VAPORS

PCTEST	FREEWAVE FCC ID: KNY-6231812519	EUT Photographs
© 2004 PCTEST Lab.	Wireless OCU Unit	Model: FGRM-511X005