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To whom it may concern:

The enclosed documents constitute a formal submittal and application for a Class II Permissive change pursuant to Parts 22 and 24 of the FCC's rules contained in CFR 47 for a device with limited modular approval, approved under FCC ID ***L2C0041TR***.

The scope of the permissive change is to add host-specific information to the grant of equipment authorization, specifically to update the erp/eirp listed under the two rule parts and rf exposure conditions.

The specific host is the Delphi Automotive Systems model TL10001-40L1. This device is a data modem that is installed into automobiles to allow wireless data logging of automobile parameters such as vehicle speed and diagnostics trouble codes (DTCs). Testing has been performed on the final product to determine the erp/eirp as required under Parts 22 and 24 of the FCC rules.

The end device is installed into a vehicle, connecting directly into the OBD II Diagnostics Link Connector (DLC) for 1996 and newer light duty vehicles and mounted inside the cab of the vehicle in locations such as beneath the instrument console. Although the end-device is not intended for body-worn applications the installation conditions in the car may cause the device to be installed within 20cm of persons (typically, ankles, feet but possibly including the legs) a SAR evaluation has also been performed to verify that the device complies with rf exposure requirements for an exposure condition of 0cm separation from the body.

A KDB was filed with the FCC under KDB **388910.** All documentation related to this KDB filing has been included with the application. The KDB was initially submitted to cover the rf exposure issues for being located close to extremities with the intent of avoiding performing a SAR test. After measurements of the final system's eirp and erp the KDB was updated to also request clarification and guidance as to how to pursue a C2PC when there would be an increase in the power rating expressed as a radiated power but no increase in the conducted output power.

As the device might be installed closer than 20cm to parts of the bodies other than extremities, SAR testing has been performed to cover installation of this specific host device into vehicles with a separation distance of less than 20cm to the body (excluding the head). . The FCC ID for the module detailed in this application was obtained through a Change in ID and the test photographs in the SAR test report are of the device with an older version of the product label showing original FCC ID rather than the ID obtained through a change in ID. Photographs showing the correct version of the host system label (with appropriate FCC ID and model number information) have been provided to support this application.

With regards to the change in output power rating, the application form we have provided lists the original erp/eirp ratings for the module as detailed on the existing grant of authorization. In the response to the KDB the FCC provided instruction on the wording to be included on the C2PC grant to account for the increased erp/eirp values. That wording shall include the following:

> *Power Output is ERP for part 22 and EIRP for part 24 measured using specific test configuration described in original filing under this FCC ID; the maximum measured radiated power for specific host configurations under permissive change filing(s) for this FCC ID is **3.02 W** for part 22 and **0.475 W** for part 24. Rated conducted output powers are **2.06 W** for part 22 and **0.90 W** for part 24.*

The conducted power ratings in the statement are taken from the test report submitted for FCC ID RI7GE864. FCC ID ***L2C0041TR*** was obtained based on a Change in ID request from FCC ID RI7GE864. The output power at the rf port has not been changed, only the radiated power have increased because of a change in the antenna assembly being used with this specific host device

Elliott Laboratories, as duly authorized agent prepared this submittal. A copy of the letter of our appointment as agent is included with the application.

If there are any questions or if further information is needed, please contact Elliott Laboratories for assistance.

Sincerely,

Mark Briggs
Staff Engineer