



NOVATEL WIRELESS

November 4, 2009

Federal Communications Commission
Authorization & Evaluation Division
7345 Oakland Mills Road
Columbia, Maryland
21046

Re: Class II Permissive Change NBZNRM-MC998

Dear Sirs:

Novatel Wireless has filed for a permissive change on the product NBZNRM-MC998 due to a change in the enclosure. This change depicted below raised the need for regression assessment of ERP/EIRP and Radiated Spurious Emissions pertaining to the WCDMA function(s) (Cellular/PCS), and retesting of SAR in all modes/bands.

Novatel did not test the GSM (EDGE/GPRS – Cellular and PCS) on this new product since the plastics used for the MC998 C2PC are essentially the same dimensions of the enclosure used for the product NBZNRM-MC996 which featured the same layout, chipset and 2G functionality that is employed in the MC998. None of the 2G parameters on the new MC998 would have been degraded as compared to the Part 22/24 and Part 15 Performance of the MC996.

The MC996 was tested and found to be in accordance with all relevant rules parts and subsequently granted. There are no RF shielding properties of the plastics.