

WelchAllyn®

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Dear Application Examiner:

Welch Allyn, Inc. is submitting this application for a Class 2 Permissive Change for Model WL1837MODGI, FCC ID: PGUWL1837. It operates as a DTS radio within the 2400 – 2483.5 MHz, 5725 – 5850 MHz frequency range. Welch Allyn is not implementing the Bluetooth® functionality resident on the WL1837MODGI radio there is no software to communicate with the stack. This change is to comply with FCC KDB 447498 RF Exposure Procedures and Equipment Authorization Policies for Mobile and Portable Devices.

The original equipment grant was issued for a mobile application. Welch Allyn would like to request a permissive change in accordance with KDB 447498 and the definition of a “Portable” host platform. Transmitters and modules approved for use in the portable exposure host platform may be used for standalone operations in mobile exposure host platforms, without further equipment approval only with the same identical transmitter and antenna required for portable device exposure conditions.

Welch Allyn is using a Pulse W1039B030 Omni-directional coaxial IPEX u.fl connector 2dBi antenna. The antenna is the same type and \leq the gain of a similar certified antenna currently on the grant.

Please note the radio is installed by Welch Allyn as a component in our medical products and cannot be used in conventional consumer electronics and is only accessible by Welch Allyn personnel

Your effort in reviewing this C2PC application is greatly appreciated.

Gratefully,

Robert Berry, Manager Regulatory Affairs