



June 8, 2009

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

Re: CR37524

Dear Sirs:

Regarding the FCC's request for additional information/clarification of information, please note below.

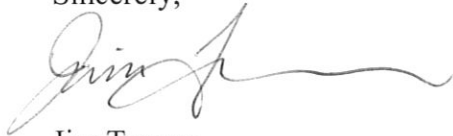
- 1) All of the FCC assumptions made are correct; Novatel Wireless does not have any objection to the FCC's plan to set aside the Grant and exchange the Form 731 line entries to list conducted powers and to have the radiated powers listed in the Grant notes.
- 2) Novatel believes the content of the Users Manual (Quick Start Guide) is appropriate and complete to address all of the concerns expressed, specifically:
 - 2(a) – The users are instructed that a minimum separation distance of 20 cm is required for operation of the device when using an external antenna;
 - 2(b) – The users are instructed that co-location of another antenna and/or operation of a radio using another antenna outside of that which is listed in the filing is not permitted.
 - The Users Guide specifically informs the end user that a maximum (external) antenna gain of 2.2 dBi is allowed in both Cellular and PCS bands of operation. This is consistent with the figures provided in the most recent MPE report submitted to the commission.
- 3) Please see attached amended photo as per request.

Novatel Wireless would like to ensure that all future references to operation of an external antenna meets the commissions requirements so that we may avoid the prolonged exchange of information as was realized during this Class II permissive Change request.

It is therefore anticipated that if the commission is in agreement with the format and content of the users manual as it pertains to the external antenna operation, that we may proceed in a similar manner on future products ensuring that the gain profile of any antenna that may be used is clearly identified and in accordance with all FCC RF exposure requirements.

We have noted the commissions remarks concerning appropriate FCC/OET grant power policies.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Turner", with a long horizontal flourish extending to the right.

Jim Turner

Regulatory Technical Specialist
Novatel Wireless