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March 6, 2007

Federal Communications Commission
Equipment Approval Services
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Steven Dayhoff

SUBJECT:	**Novatel Wireless Inc.**
	FCC ID: PKRNVWMX720
	731 Confirmation No.: EA826034
	Correspondence Reference No.: 32548
	Request for Tech. Info.: February 12, 2007

Dear Steven:

Transmitted herewith, on behalf of **Novatel Wireless Inc.** is an amendment provided in response to the request for technical information dated February 12, 2007.

A. The Short-Term Confidentiality Request has been uploaded.

B. The installation/ operating instructions for this changed device have been uploaded.

C. Since there is no formal test procedure for USB-dongle transmitters, PCTEST (Al Cirwithian) contacted Tim Harrington to inquire about the test procedure that should be used for SAR testing of this application. PCTEST suggested using the same procedure that was used in a previous application granted by the FCC (EA420698), and Tim agreed. In that test procedure, the spacing from the phantom was based on the spacing provided a notebook PC when the transmitter was plugged directly into the USB port without the cable. This spacing is stated in the User's Manual. Thus, absent a formal test procedure for USB-dongle transmitters, PCTEST followed the commission's instructions and used a test procedure that had been previously approved by the FCC. We understand that the USB-dongle configuration is difficult to standardize and interpretations may evolve. We respectfully request the same consideration granted for the previous submission. We understand the need to continually seek the commission's advice on future applications of this nature.

D. There have been no changes made to the EUT in this application (only the addition of the USB cable). In the original test report test configuration, the EUT was on an extender card, protruding from the notebook pc – in other words, it received no shielding from the PC. In this Permissive Change application, wherein a USB cable has been added, there is still no shielding from the PC, therefore, the original EMC data is still applicable.

We trust this information is sufficient to resolve FCC questions in this application. If you have any further questions, please do not hesitate to contact us.

Randy Ortanez
President

cc: Novatel Wireless Inc.