

March 18, 2013

To Whom It May Concern:

We, Qualcomm Atheros, Inc. hereby apply for Class II permission change to the approved product under FCC ID: PPD-AR5BMD22 (IC ID: 4104A-AR5BMD22), to portable category when applied in the laptop platform Brand Name: Acer/Model Name: **W710**, **W710P**, **W711**, **W711P**, **ASPIRE P3-151\*\***, **ASPIRE P3-171\*\*** (*"\*"* = **0-9**, **a-z**, **A-Z**, *"(", ")"*, *"-", "/", "\", "\_"* or **blank**), Due to the design of the platform resulting in less than 20cm distance to human body, We have tested the platform with the FCC ID: PPD-AR5BMD22 (IC ID: 4104A-AR5BMD22) device for SAR. Radiated emission testing was not additionally performed due to the following:

- The product with FCC ID: PPD-AR5BMD22 (IC ID: 4104A-AR5BMD22) module was assessed compliant to radiated emission limits per 15.247 in its initial FCC approval
- The transmit power in this specific host is reduced by Software setting. The Hardware design and all other RF parameters remain the same as in original granted.
- Original FCC testing was performed with an antenna of higher gain. The current platform under application uses an antenna of the same type but of lower gain across the emission bands. Hence it is apparent that the current platform yields lower level of radiated emission.
- The original FCC testing on module under FCC ID: PPD-AR5BMD22 (IC ID: 4104A-AR5BMD22) was performed when the antenna was connected to the module in an open environment. The current platform under application has the antenna installed inside the laptop enclosure. The physical restraints introduced by the laptop enclosure should have resulted in equal or lower level of radiated emission.

Please kindly review the application documents submitted and grant approval for this permissive change application

Sincerely yours,

Michael Theen

Michael Green / Manager, Global Product Compliance