



Qualcomm Technologies, Inc.
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May 27, 2019

To Whom It May Concern:

We, Qualcomm Atheros, Inc. hereby apply for Class II Permission Change to the approved product under FCC ID: **PPD-QCNFA435** (Permissive Class 4 Change under IC: **4104A-QCNFA435**), to portable category when applied in the **Dell** computer model **P31T** due to the design of the platform resulting in less than 20 cm distance to human body, we have tested the platform with the FCC ID: **PPD-QCNFA435** (IC: **4104A-QCNFA435**) device for SAR. Radiated emission testing was not additionally performed due to the following:

- The product with FCC ID: **PPD-QCNFA435** (IC: **4104A-QCNFA435**) module was assessed compliant to radiated emission limits per 15.247 and 15.407 in its initial FCC approval, and RSS-247 in its initial IC approval.
- The host antenna is designed for a lower peak gain in the intentional transmit frequency bands and therefore radiated performance in the intentional frequency bands and the spurious emissions out of bands are expected to be lower than that measured in the original modular approval.

Please kindly review the application documents submitted and grant approval for this Permissive Change application.

Sincerely yours,

Stanley Lin
Qualcomm Technologies, Inc.