Applicant: u-blox Berlin GmbH
Rudower Chausse 9
12489 Berlin
Germany

To whom it may concern,
This cover letter relates to the following product:

WiBEAR11n-DF2 / ELLA-W163
FCC ID: PV7-WIBEAR11N-DF2
IC: 7738A-WB11NDF2

This filing is being submitted solely for the purpose of bringing the product in line with the updated rules for FCC Part 15.405 and IC RSS-247. No changes to the product have been made under this permissive change / reassessment filing.

The ELLA W1 platform shares a common design across multiple products. Consider the following constellation:

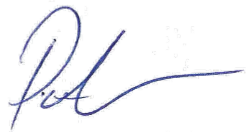| Product	FCC ID	IC Number	Bluetooth Based on	What Changed	2.4GHz Wi-Fi Based On	What Changed	5GHz Wi-Fi Based On	what Changed
SF1	PV7-WIBEAR11N-SF1	7738A-WB11NSF1	Parent	NA	Parent	Parent	NA	NA
SF2	PV7-WIBEAR11N-SF2	7738A-WB11NSF2	SF1	Additional RF Path	SF1	No Difference	NA	NA
DF1	PV7-WIBEAR11N-DF1	7738A-WB11NDF1	SF1	No Difference	Parent	Parent	x	Parent
DF2	PV7-WIBEAR11N-DF2	7738A-WB11NDF2	SF2	No Difference	DF1	No Difference	DF1	No Difference

The initial product was the SF1, supporting Bluetooth and 2.4GHz Wi-Fi. This was extended to the SF2, which separated the Bluetooth and Wi-Fi chains.

The DF1 introduced a 5GHz UNII radio to a single antenna. The Bluetooth and 2.4GHz radio parts are the same as the SF1 product. The DF1 was tested as a parent product.
The DF2 separates the Bluetooth chain to a separate antenna, leaving the 2.4Ghz/5GHz Wi-Fi chain identical to that used in the DF1. The Bluetooth chain in the DF2 is identical to that used in the SF2.

As per KDB inquiry 586005, uploaded with this submission, the re-use of results from one product to another product is acceptable so long as the radio chains remain the unchanged.

Please refer to the below table for an explanation of the test results applied to the DF2 and the corresponding test reports.

Test item	Test report reference	Taken from product	Comment
Bluetooth	MDE_UBLOX_1611_FCCg	SF2	None
2.4 GHz Wlan	MDE_UBLOX_1624_FCCc	DF1	None
5 GHz WLAN	MDE_UBLOX_1624_FCCa	DF1	Retested UNII Items according to rule update
	MDE_UBLOX_1624_FCCd		None

Patrick Lomax
5/20/2016 Ratingen Germany