



LS RESEARCH, LLC

Wireless Product Development

May 28th, 2009

Federal Communications Commission
445 Twelfth Street S.W.
Washington, DC 20554

Subject: FCC Class II Permissive Change for FCC ID: PZ3-XR

The intent of this letter is to state the reason for a Class II Permissive Change on the Primex product using FCC ID: PZ3-XR. Product was originally tested and a grant was issued in 2006. Upon review the original grant did not include the entire frequency range capable for the product. Therefore the manufacturer (Primex) authorized LS Research to work on their behalf to obtain a Class II Permissive Change that includes a revised Grant of Authorization.

In order to support the Class II Permissive change the product was retested to include the additional frequencies. Test results are supported by test report 309109. The manufacturer (Primex) confirmed no changes were made to the existing product from 2006 to the current version tested in test report 309109.

Test report 309109 indicates a small increase in output power, however the increase was not intentional and was most likely a result of measurement uncertainty. LS Research submitted a KDB Inquiry to verify a Class II Permissive Change was acceptable with the increased output power. FCC responded that the original grant output power would need to remain unchanged; however the product does still qualify for a Class II Permissive Change for the frequency change. If greater detail is required please reference FCC Tracking Number 783744.

Regards,

Teresa A. White
Quality Manager
262.421.4991
twhite@lsr.com