iridium®

CLASS II PERMISSIVE CHANGE AND MODULAR APPROVAL REQUEST

September 7, 2010

TRaC Global
100 Frobisher Business Park
Leigh Sinton Road
Malvern
Worcestershire
WR14 1BX
UK

RE: CLASS II PERMISSIVE CHANGE AND MODULAR APPROVAL REQUEST
FCC ID: Q639522B

To Whom It May Concern:

Please be advised that pursuant to FCC Rule 47CFR 2.1043 the manufacturer requests that the above-referenced model be approved for class II permissive change.

The above mentioned product will be undergoing a change in classification from a non-modular product to a modular.

Please be advised that the manufacturer declares that the above mentioned product satisfies the requirements for modular transmitters subject to section 15.212 of the FCC ruling:

i. The radio elements must have the radio frequency circuitry shielded. Physical/discrete and tuning capacitors may be located external to the shield, but must be on the module assembly;

ii. The module must have buffered modulation/data inputs to ensure that the device will comply with Part 15 requirements with any type of input signal;

iii. The module must contain power supply regulation on the module;

iv. The module must contain a permanently attached antenna, or contain a unique antenna connector, and be marketed and operated only with specific antenna(s), per Sections 15.203, 15.204(b), 15.204(c), 15.212(a), 2.929(b);

v. The module must demonstrate compliance in a stand-alone configuration;

vi. The module must be labelled with its permanently affixed FCC ID label, or use an electronic display (See KDB Publication 997198 about labelling requirements);

vii. The module must comply with all specific rules applicable to the transmitter. The grantee must provide comprehensive instructions to explain compliance requirements;

viii. The module must comply with RF exposure requirements. For any transmitters intended for use in portable devices, SAR compliance must be demonstrated to be independent of the host device.

Thank you for your attention to this matter.

Sincerely,

Donna Bethea-Murphy
VP, Regulatory Engineering
Iridium Communications, Inc