

Gas Control Equipment

Date: 20/08/2019

Dear Application Examiner:

We, the undersigned, request a Class II permissive change to the below modules to permit usage in our host device, Zeno Lite Portable Oxygen Concentrator with Clarity Connected Care, model RS-00600C under FCC rule 47 CFR Section 2.1043. This device contains only 2 intentional transmitters, they are:

- A Gemalto Cinterion PLS62W Module, FCC ID:
QIPPLS62-W
- A Silicon Labs Blue Gecko BGM121/BGM123 Bluetooth Smart Module, FCC ID:
QOQBGM12LMA

Please see the accompanying product architecture overview for details of the system integration.

All modules have been designed into our host product according to their supplied modular use design guidelines. While the individual modular grants are not sufficient for our use case, and that we have a new antenna with the QIPPL62-W module, we have supplied new test evidence to support this change in accordance with Class II Permissive Change guidelines. We are transmitting simultaneously on both the PLS62W and the BGM121/BGM123.

Testing has been carried out by Element Materials Technology Ltd in the UK and Verkotan Oy in Finland.

Yours sincerely,



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