

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia MD 21046

C.C.: Telefication B.V., Dept. FCC TCB  
Edisonstraat 12A  
6902 PK ZEVENAAR  
The Netherlands

Subject: Requesting Class II permissive change for FCC ID: RWO-RZ090310  
To Whom It May Concern:

The purpose of this letter is to request a Class II Permissive change for  
FCC ID: RWO-RZ090310, original granted on 07/15/2019.





The major change field under this application is:

1. The subject approved module is being used in a portable configuration- a Notebook (Brand name/Model: RAZER/ RZ09-0369), the distance between antenna and human body is 0mm and the original module report the distance is 17mm. SAR testing was performed to demonstrate RF compliance.
2. The difference compared with the original module design is antenna change. Two groups antennas are used for the subject approved module in the Notebook Computer as below listed.

Original module:

ANTENNA INFORMATION	
ANTENNA DESCRIPTION	GAIN (dBi) or Integral
SkyCross Reference Antenna, Type PIFA	
2400-2484 MHz	3.24 dBi
5150-5250 MHz	3.64 dBi
5250-5350 MHz	3.73 dBi
5470-5725 MHz	4.77 dBi
5725-5850 MHz	4.97 dBi

Notebook :

Ant.	Type	Antenna Mfr.	Antenna Gain (dBi)	Note
1	PIFA		3.69	2.4G
	PIFA		4.65	5G
2	PIFA		2.79	2.4G
	PIFA		4.69	5G

3. For the Notebook , since it is client without DFS radar detection capability, detection threshold as set to the module remains identical, and would deactivate the link as it is operated with AP only, DFS test can be excluded.

4. Reduce the Output Power through software, and SAR measurement was evaluated.

Please contact me if you have any questions or need further information regarding this application.

Best Regards



---

Name: Johnsen Tia  
Title: Senior Director, Regulatory & Compliance  
Date: 7 Jan 2021