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-RZ090368.

To Whom It May Concern:

The purpose of this letter is to request a Class II Permissive change for:
FCC ID: PD9AX210NG, granted on 02/18/2021. (Original Equipment)
FCC ID: RWO-RZ090368, granted on 07/19/2021. (Change in Identification)

The major change field under this application is:

1. The subject approved module is being used in a portable configuration- a Notebook PC (Brand name/Model: RAZER/ RZ09-0406), the distance between antenna and human body is 0mm. SAR testing was performed to demonstrate RF compliance. Because the antenna gain is larger than that of the module, RF testing was also performed to demonstrate RF compliance.

2. The difference compared with the original module design is added below frequency by software.
   Wi-Fi 6E: 5955-7115MHz, 5965-7085MHz, 5985-7025MHz, 6025-6985MHz.
   There is no hardware modification made to the applying modular transmitter itself.

   Two group antennas are used for the subject approved module in the Notebook PC as below listed.

   Original module:

Transmitter	Ant A (Main) SISO Mode	Ant B(Aux) SISO Mode	Ant A (Main) MIMO Mode	Ant B (Aux) MIMO Mode
Manufacturer	Intel	Intel	Intel	Intel
PIFA antenna	PIFA antenna	PIFA antenna	PIFA antenna	PIFA antenna
SN	NA	NA	NA	NA
Declared Antenna gain (dBi)	+5.59	+5.59	+5.59 (Completely uncorrelated)	+5.59 (Completely uncorrelated)

Notebook:

PIFA Antenna		
WLAN:	MAIN ANT	AUX ANT
U-NII-5:	6.61	3.36
U-NII-6:	7.12	7.14
U-NII-7:	7.12	7.14
U-NII-8:	7.05	7.33

3. 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

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06 Dec 2021