

May 13, 2011

Federal Communications Commission Office of Engineering and Technology Equipment Authorization Division 7345 Oakland Mills Road Columbia, MD 21046

Re:

FCC Form 731 Application for Class II Permissive Change Request for FCC ID: SM6-MINODE-

WATER

Dear Application Examiner:

Pursuant to Section 2.1043(a)(2) of the Commission's Rules, Mueller Systems, LLC ("Mueller Systems"), respectfully requests a Class II Permissive change for the FCC ID: SM6-MINODE-WATER. There are three pieces to this change. The first change to allows the use of a new hailing mode of operation. This new mode requires the definition of new channels dedicated to the hailing mode of operation. The hailing mode of operation is defined in the document "Theory_of_OpS for FCC3.0 MiNet RF products.doc" submitted with this request. The second change is a package change to a 32,768Khz crystal used on the PWB to improved reliability. This device is not part of the RF signal path. The third change is a modification to the shield lid for ease of assembly.

Consistent with the Rules, Mueller Systems hereby provides complete information and applicable test results of the modifications of the performance characteristics of the originally authorized equipment. These materials include tests for radiated emissions in the restricted bands which indicate continuing compliance of the unit with the Commission's Rules.

Thank you for your attention to this matter.

Very truly yours,

Clayton Robert Barker III

Executive Vice President & General Counsel

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