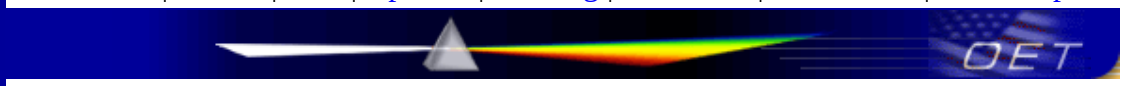
Rich Fabina

From: oetech@fccsun27w.fcc.gov
Sent: Tuesday, April 10, 2012 10:15 AM
To: Richard Fabina
Subject: Response to Inquiry to FCC (Tracking Number 172080)



Office of Engineering and Technology

Inquiry on 04/04/2012:
Gentlemen:

ACB is processing a Class II permissive change on a device identified by FCC ID: TFB-TIWI1-01. According to page 3 of KDB 178919, paragraph i(c), the document states- ?A chip replacement of a portion of the transmitter that performs some sub-function such as an amplifier chip, oscillator chip or frequency determining chip may be considered a Class II permissive change under the following conditions; however, replacement of a chip that constitutes a complete transmitter shall require a new FCC ID.?

The last part of this sentence seems to prohibit the replacement of a chip if it is the whole transmitter in a device. Our client maintains that the change is a software change only that adds new transmitter functions to the device. See the cover letter and slides form Texas Instruments on the differences between the original and substitute chip.

Will the FCC allow this proposed change in chip as a Class II permissive change?

I?ve included the FCC policy on Permissive Changes (KDB 178919), the client?s cover letter describing the changes, and Texas Instruments slides on the chip differences to help you make a determination. Please let me know if you require any further information.

Thanks for your time,

Rich Fabina

ACB Review Engineer

Response on 04/10/2012:
We have looked into the difference between WL1271 and WL1271L and have concluded that indeed the difference is in software only, it can be considered to be adding an operation mode instead of a chip change; more specifically, WL1271L adds the support of BLE protocol. Therefore, the change can be processed by a Class II Permissive Change (C2PC) if this is the only difference as stated.

However, note that a C2PC is conditioned upon if the original grant already includes a DTS certificate since Bluetooth LE is classified as a DTS transmitter instead of DSS. If the DTS portion would be a new grant, since permissive change cannot add equipment type, a new FCC ID application is required.

FCC PC Policy KDB 178919

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