

RESEARCH, LTD.

ALCON RESEARCH, LIMITED 15800 ALTON PARKWAY P.O. BOX 19587 IRVINE, CA 92623-9587 (949) 753-1393

February 12, 2008

Federal Communication Commission Authorization and Evaluation Division 7435 Oakland Mills Road Columbia, Maryland 21046

Dear Application Examiner:

Alcon Research Ltd. is submitting this application for the Class 2 Permissive change of their Wi-Fi radio, FCC ID: VMC212WIFI. The C2PC will cover the following:

- Addition of a short antenna cable between antenna port of radio module and dipole antenna.
- Limited modular approval of the radio to permit installation in Alcon's Constellation Vision System (NGVS), FCC ID: VMC212-1.

The NGVS was previously certified under FCC 15.225 and contains up to four identical RFID radios. It is not subject to routine environmental testing or evaluation. The NGVS is an ophthalmic surgical instrument that drives various hand pieces to cut tissues, emulsify lens, and illuminate a segment of the eye.

No changes have been made to the circuit board or operating modes of FCC ID: VMC212WIFI. Radiated and conducted emissions tests were performed with the radio installed in the Constellation Vision System to ensure continued compliance.

The technical reports and exhibits demonstrate compliance with FCC rules 47 CFR 15.247.

Your efforts in reviewing this application are greatly appreciated.

Best regards,

Dharmesh A. Modi

Assoc. Director Product Certification/ Regulatory Affairs

Tel: 949-753-6763, Fax: 949-753-6250

dan.modi@alconlabs.com