

Elliott TCB 41039 Boyce Road Fremont, CA 94538

To whom it may concern:

The enclosed documents constitute a formal submittal and application for a Class II Permissive change for an 802.11bg module pursuant to Subpart C of Part 15 of FCC Rules (CFR 47).

The proposed change to the module is to use the module in a portable host system with a new antenna type. In addition the module will be co-located with a Bluetooth module (FCC ID: VSF19979AR).

The application's supporting documentation covers measurements of radiated spurious emissions from the WiFi module with the new antenna (installed into the host device) and an rf exposure evaluation using SAR measurements for the module installed into the host device for body-worn use. Proximity to the head is not addressed as the host does not support voice-calls.. The Bluetooth module was exempt from SAR evaluation based on output power and antenna separation distances. Please note that the RF exposure exhibits include a drawing showing antenna separation distances. That drawing includes the location of a proposed GSM module antenna. Co-location with the GSM module will be addressed through a C2PC for the GSM module once the module's installation conditions have been finalized.

Elliott Laboratories, as duly authorized agent prepared this submittal. A copy of the letter of our appointment as agent is included with the application.

If there are any questions or if further information is needed, please contact Elliott Laboratories for assistance.

Sincerely,

Mark Briggs Staff Engineer