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July 20, 2009

Federal Communication Commission  
Equipment Authorization Division, Application Processing Branch  
7435 Oakland Mills Road  
Columbia, MD 21048

Subject: Request Identifier Change from: N7NMC8775V to: VZ8703541GSM

Ref: OET KDB 623615

Dear Examiner,

Pursuant to Paragraph §2.933 of the Commission's Rules (47 C.F.R.) and OET KDB 623615, L-3 Communications Corporation, Communication Systems – East (L-3 CS-E) requests a change to the FCC Identifier for the Sierra Wireless model MC8775V radio module used in the L-3 Guardian™ GSM product to VZ8703541GSM. The existing FCC Identifier N7NMC8775V is held by the grantee-manufacturer Sierra Wireless. Authorization for N7NMC8775V was previously granted on originally granted on August 5<sup>th</sup> 2006.

No design changes to MC8775V radio module were required for embedment into the L-3 Guardian™ GSM product. However, the L-3 Guardian™ antenna is different than the antenna used in the equipment from the original Sierra Wireless grant. For this reason only the conducted based test measurements from the aforementioned N7NMC8775V filing apply to the L-3 Guardian™ product. Radiated based test measurements have been completed on the L-3 Guardian™ GSM device. Both conducted and radiated test reports are included in this submission (exhibit 6). All test reports included in this filing were generated prior to this request for identification change and refer to the radio module FCC ID N7NMC8775V. Please refer to the Operational Description Document (exhibit 12) for photographs of the L-3 Guardian™ product and drawings of the proposed FCC ID label modification.

As the grantee for the FCC ID VZ8703541GSM L-3 CS - East understands that the approval under consideration for the L-3 Guardian™ is a non-modular and cannot be used on any other product in the future without applying for a new FCC grant and ID. Furthermore, it is understood that L-3 CS - East is the party responsible for maintaining FCC compliance activities including permissive changes made by the manufacturer of the embedded radio modules that impacts use in our product.

If you have any questions, please feel free to contact me at the address below.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Honeywell".

Robert Honeywell  
Subcontract Manager