

Elliott TCB
41039 Boyce Road
Fremont, CA 94538

RE: FCC/IC Class II Permissive Change/Reassessment for Avaya, FCC ID: X7CAP8120, IC ID: 3794G-AP8120

To whom it may concern:

The enclosed documents constitute a formal submittal and application for a FCC Class II Permissive Change/IC Reassessment for an 802.11abgn access point to the following rules:

Subpart C of Part 15 of FCC Rules (CFR 47), Section 15.247

Subpart E of Part 15 of FCC Rules (CRF 47)

RSS-Gen Issue 3, **June 2007**, “General Requirements and Information for the Certification of Radiocommunication Equipment”

RSS-210, Issue 8, **June 2007**, “Low-power Licence-exempt Radiocommunication Devices (All Frequency Bands): Category I Equipment”

The device was originally certified for operation in the DTS and all NII bands, as a master device, using an integral antenna. This permissive change/reassessment is to address changes to the product to support removing the integral antenna and using it externally and the addition of a new, higher gain, panel antenna.

Due to the higher gain of the panel antenna, power has had to be reduced for this configuration from the original certified device.

This C2PC is limited for the NII approval to the non-DFS band, 5150-5250MHz. Avaya has provided an attestation that they will limit operation to the non-DFS bands for the external antenna configuration.

Changes to the product include the removal of the external plastic cover that enclosed the AP and the integral antenna and the mounting of 6 reverse SMA connectors on the side of the metal enclosure.

The application forms provided list all of the operational bands from the original approval for your convenience.

For Industry Canada, the external antenna configuration will use the same model number as the original filing.

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,

A handwritten signature in blue ink, appearing to read "Mark Hill". The signature is fluid and cursive, with the first name "Mark" and last name "Hill" clearly distinguishable.

Mark Hill
Staff Engineer

MEH/dmg