### **Zinwell Corporation**

# 7F., No.512, Yuanshan Rd., Zhonghe Dist., New Taipei City 235, Taiwan (R.O.C.)

Tel: 886-2-2225-1929 Fax: 886-2-2225-6229

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Subject: DFS Expedited Review Request for FCC ID: YG7ZRF32200

#### To Whom It May Concern:

The following provides the required information concerning Zinwell's request for Expedited review of the class II permissive change of module FCC ID: YG7ZRF32200.

This expedited review request is based on identity of the hardware and critical aspects of the processing software of the device under the CIIPC, with respect to the original device application.

Every change is processing software that was done in order to meet the new FCC requirements with respect to radar detection and DFS requirements was done without changing the existing capabilities, and only adding to meet the new required capabilities, with minor changes that are available due to the modularity of the processing algorithm. The performance and capabilities are supported by the certification laboratory test reports.

The legacy DFS characteristics and functionality was not changed under this CIIPC, compared to the original device, as detailed in following table:

Characteristic Description	Original Granted Device FCC ID: YG7ZRF32200	New Application under CIIPC FCC ID: YG7ZRF32200
Technology	OFDM; Multiple-in, Single-out.	(no change) OFDM; Multiple-in, Single-out.
Bandwidth information and difference	40MHz	(no change) 40MHz
Antenna information and difference for the minimum gain antennas	Chip antenna with 6.2dBi gain; Printed antenna with 6.2dBi gain.	(no change) Chip antenna with 6.2dBi gain; Printed antenna with 6.2dBi gain.
Difference in DFS functioning, circuitry, software, etc.	(Reference device)	(Similar) DFS Functioning: Same; Same DFS detection and response algorithm; RF Circuitry: same gain and sensitivity.
		Software: A SW modification was done to accommodate the

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Difference between the	(Reference device)	new type 1 radar and detection BW requirement. No degradation in original radar detection performance due to this change.
products such as TX power, modulation, receivers, processing circuitry, etc.	(Neierence device)	dame
Names of the test labs for the various labs	ADT	ADT

Sincerely yours,

Name: Gary Tsai / Title: Senior Manager

Tel: 886-2-2225-1929

Fax: 886-2-2225-6229

E-mail: tph@zinwell.com.tw