

Dodds LLC
Suite 400, 8040 Excelsior Drive
Madison, WI 53717

Federal Communications Commission
Laboratory Division
7435 Oakland Mills Road
Columbia, MD 21046

Re: FCC Class II Permissive change for FCC ID: ZHS-1013
Original Grant date: 09/06/2012
Applicant: Dodds LLC

Dear Sir or Madam:

Dodds LLC and its affiliates ("Dodds") are requesting a Class II permissive change for FCC ID: ZHS-1013, granted on 09/06/2012, solely to add the new channel CH165 (5825MHz) (the "New Channel") to the original digital transmission system (DTS) equipment authorization application only.

Description of New Channel Implementation

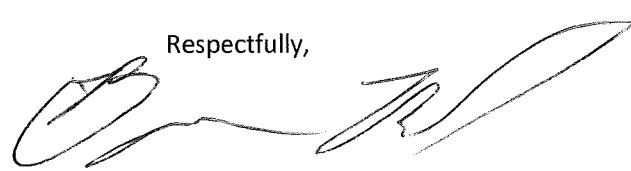
The New Channel is enabled through a software change only. The software control for the New Channel will not be accessible to end users. Additionally, the software change can only be made by the manufacturer or the OEM. For clarity, no hardware changes will be made to the equipment authorized under FCC ID: ZHS-1013 to implement the New Channel.

Basis for No New SAR Assessment

RF/EMC testing was performed on the equipment with the New Channel in accordance with the FCC rules and the applicable OET Laboratory Division Knowledge Databases (KDBs) released in October 2012 by the FCC. When compared to the original testing results (as also submitted to the FCC), the testing results for the equipment with the New Channel demonstrate that the RF conducted power at CH165 is lower than that at CH161. Based on those findings and the guidelines under KDB 248227, no additional SAR assessment is included in this Class II permissive filing.

We thank you in advance for your time and consideration of this request.

Respectfully,



Bryan Reed
President
Dodds LLC