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Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, Maryland 21046

Dear Application Examiner:

Zoll is seeking a Class 2 Permissive Change for FCC ID:ZKP-RDC002.

Applicable FCC Rules:

FCC 15.247
FCC 15.407

This application is for the R Series Data COMM II Wi-Fi product manufactured by Logic PD for ZOLL Medical Corporation. The primary function of the product is to transfer data from the R Series Defibrillator products manufactured by ZOLL Medical Corporation to other external devices in various forms of Local Area Networks or through gateways to Wide Area Networks. The R Series Data COMM II module is a separate enclosed unit in a CF card format. During a medical intervention, the R Series Data COMM II module is in a non-powered state. The R Series Data COMM II module is used by inserting it into a CF card slot on the R Series Defibrillator.

The R Series Data COMM II module contains an embedded communication module. The module's primary function is communication. To support this operation, the embedded communication module supports the following capabilities.

- 802.11 abgn: Products will be constrained to operate only in the 2.4, 5.2, 5.3, 5.6 and 5.8 GHz bands

The following power levels were used during testing of this device.

WIFI Channel	Power setting
1	0x1A
6	0x24
11	0x1E
36	0x19
48	0x1A
52	0x16
64	0x1D
100	0x13

116	0x50*
140	0x1D
149	0x21
157	0x50*
165	0x50*

*Note – A setting of 0x50 indicates power is not restricted by software.

The embedded communication module of the R Series Data COMM II Wi-Fi product utilizes EPSON part number TG-5035CJ-18S 26.0000MHZ in Y4 and Y5 component locations. This part has been discontinued due to a fire at the AKM semiconductor factory. Y4 supplies a clock signal to the wireless IC has been replaced by Epson part number TG2016SMN 26.000000MHz ECGNNM. Y5 supplies a clock to the processor and has been replaced by Abracon part number AMPMAFB-26.0000T. To better support these new oscillators, C206 has been changed to a 22 Ohm resistor and R163 has been depopulated.

We are seeking a class 2 permissive change for the following item changes to the Torpedo + Wireless SOM -32 SOM contained within the R Series Data COMM II Wi-Fi product:

- Component Changes: Y4, Y5, C206 and R163

Your efforts in reviewing this application are greatly appreciated. Please contact me if there are questions or additional information needed concerning this request.

Sincerely,



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 Principal Compliance Engineer
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