
Federal Communications Commission
7435 Oakland Mills Road
Columbia MD 21046

Date: September 20, 2018

Subject: Requesting Class II permissive change for FCC ID: ZMOL850GL

To Whom It May Concern:

The purpose of this letter is to request a Class II Permissive change for FCC ID: ZMOL850GL, original granted on 03/10/2017.

Applicant: Fibocom Wireless Inc.

A. DESCRIPTION OF PRODUCT CHANGES,

- a. The subject approved module is being used in different host (Portable category Configuration, Host Brand/Model: Lenovo ideapad D330-10IGM;
- b. Disable LTE Band 38 by software.
- c. Change antenna (maximum antenna gain less than original grant), the physical restraints introduced by the host platform should have resulted in ERP/EIRP/Radiated spurious emission, measured ERP/EIRP/RSE with new antenna.

B. PERFORMANCE DIFFERENCES:

Description	Re-testing item	Remark
ERP/EIRP/Radiated spurious emission	Need testing	a. The Original FCC testing on module under FCC ID: ZMOL850GL was performed with antenna of higher gain, and the antenna was connected to the modular in an open environment. The current host platform under application uses an antenna lower gain and is installed inside the host platform enclosure. The physical restraints introduced by the host platform should have resulted in ERP/EIRP/Radiated spurious emission. Therefore additional ERP/EIRP/Radiated spurious emission testing is necessary.
SAR	Need testing	a. Measured SAR at cellular with new

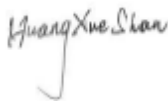
		<p>host.</p> <p>b. There are three WLAN/BT modules integrated in this host. One is Intel 31652D2W, second is Intel 8265D2W, the third is QUALCOMM QCNFA425;</p> <p>c. For Intel 31652D2W (FCC ID: PD931652D2), supports 2.4GHz/5GHz WLAN and dual mode Bluetooth;</p> <p>d. For Intel 8265D2W (FCC ID: PD98265D2), supports 2.4GHz/5GHz WLAN and dual mode Bluetooth;</p> <p>e. For QUALCOMM QCNFA425 (FCC ID: PPD-QCNFA425) supports 2.4GHz/5GHz WLAN and dual mode Bluetooth;</p>
External Photos	Provided	a. Provided host device Lenovo ideapad D330-10IGM
Internal Photos	No Need	
RF Test Setup Photos	Provided	
SAR Test Setup Photos	Provided	

d. CONCLUSION:

ERP/EIRP level at new host with new antenna lower than original modular grant, this radio continues to meet all FCC standard requirements, including RF Exposure, thus this change does meet requirements a Class II Permissive Change.

Sincerely,

Best Regards



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