2013/3/27

To Whom It May Concern:

We, Qualcomm Atheros, Inc. hereby apply for Class II permission change to the approved product under FCC ID: PPD-AR5B22 (IC ID: 4104A-AR5B22), to portable category when applied in the laptop platform Brand Name: Dell /Model Name: W01A,W01A001 and XPS18, Due to the design of the platform resulting in less than 20cm distance to human body, We have tested the platform with the FCC ID: PPD-AR5B22 (IC ID: 4104A-AR5B22) device for SAR. Radiated emission testing was not additionally performed due to the following:

- The product with FCC ID: PPD-AR5B22 (IC ID: 4104A-AR5B22) module was assessed compliant to radiated emission limits per 15.247 in its initial FCC approval
- Original FCC testing was performed with an antenna of higher gain. The current platform under application uses an antenna of the same type but of lower gain across level of radiated emission.
- The original FCC testing on module under FCC ID: PPD-AR5B22 (IC ID: 4104A-AR5B22) was performed when the antenna was connected to the module in an open environment. The current platform under application has the antenna installed inside the laptop enclosure. The physical restraints introduced by the laptop enclosure should have resulted in equal or lower level of radiated emission.

Please kindly review the application documents submitted and grant approval for this permissive change applicant
Sincerely yours,

Michael Green / Manager, Global Product Compliance