GE Healthcare

Subject: Cover letter - FCC change in ID and C2PC request

Date: December 1, 2021

To: Federal Communications Commission
7435 Oakland Mills Road
Columbia, Maryland 21046
USA

GE Healthcare (later GE) requests a change in ID for the FCC ID: Z64-WL18DBMOD. The new GE ID applied is the FCC ID: 2AO8L-WL18DBMOD. Limited modular approval is applied for the module as it is used only in one GE's own product (Portrait HUB01, FCC ID: 2AO8L-HUB01) and it is not for sale. The module is installed under RF shieling on the HUB01 PCB and the HUB01 mechanics is glued permanently closed, which makes it virtually impossible to open by an end-user. In addition, GE's FCC grantee code is longer than the original code and thus it does not fit into the module. Due to these reasons GE does not add a physical label onto the module. Instead, eLabeling is used via the HUB01 screen. The user manual integration instructions are GE's internal and confidential manufacturing documents. The original TI grant has restrictions which do not allow the module usage in the HUB01 host device. Thus, GE also requests Class II Permissive Changes (C2PC) to the GE ID to allow:

Use with co-located transmitters:
In the GE product the TI module is located inside the same mechanics with the Medical Body Area Network (MBAN), Near Field Communication (NFC) and Radio Frequency Identification (RFID) transceivers. The C2PC is justified as the retesting shows that the applicable FCC part 15 requirements are met in the GE host device (Portrait HUB01) with all the radios active simultaneously.

Use in a portable host device:
The Portrait HUB01 is a body-worn device and thus categorized as a portable device (not a mobile device as defined in the original TI grant). The C2PC is justified as the Portrait HUB01 has undergone a SAR evaluation for the portable device and it complies with the requirements of the FCC part 2.1093.

New integrated GE custom antennas:
The GE custom antennas used in the Portrait HUB01 and to be added to the GE ID are:

- Top antenna (free space) max gain:
  - +6.0 dBi @ 2400-2483.5 MHz
  - +6.8 dBi @ 5170-5835 MHz
- Bottom antenna max gains:
  - N/A @ 2400-2483.5 MHz (antenna not used)
  - +4.0 dBi @ 5170-5835 MHz

The C2PC is justified as the GE custom antennas are characterized and the retesting shows that the applicable FCC part 15 requirements are met in the GE host device (HUB01).

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The C2PC does not cover Bluetooth or WLAN MIMO operation modes as those are disabled in the GE host device. A separate C2PC will be submitted if those modes are enabled in future product releases.

In the case of any questions please feel free to contact me.

Sincerely,

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