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To: Federal Communications Commission
Office of Engineering and Technology Laboratory Division
Equipment Authorization Division
7435 Oakland Mills Rd
Columbia MD 21046-1609

From: David Waitt
Sr. Regulatory Engineer, Palm inc.

Subject: Class II Permissive Change Application for O8FJIMI

Date: 24 October 2005

Gentlemen,

Please accept this Class II Permissive change application to FCC ID O8FJIMI. The scope of this permissive change is to allow the newly certify O8FJIMI smart phone to be operated with a previously certified SDIO IEEE802.11 B intentional radiator in portable co-located transmitter configuration.

The FCC ID of the SDIO card intended to be operated with the O8FJIMI product is: QPUWLAN6060SD. It is not anticipated that the product will be operated with any other available ADIO card. Nor will Palm advocate use of any other SDIO card other than the one specified above.

In keeping with current FCC policy, a permissive change will be filed against the QPUWLAN6060SD grant to remove the "no co-location" restriction from the grant notes of both products. However the permissive change for the SDIO card will be filed upon issuance of this permissive change. This allows any issues with the SDIO card permissive change that arise as a result of this current request to be addressed prior to submitting the application.

Please note that the only test reports being submitted to support this permissive change request is SAR testing. Co-Located radiated emission performance has been verified, but the data not submitted in accordance with current FCC policies.

Additionally, please note that there was considerable guidance obtained from the Commission regarding the "Grid-Summing" SAR test procedure prior to the start of testing. This guidance is outlined in the SAR report on page 13.

If you have any additional questions or require clarification, please do not hesitate to contact me at the email and / or phone numbers below.

A handwritten signature in black ink, appearing to read "David Waitt". The signature is fluid and cursive, with a large initial "D" and "W".

David Waitt
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