



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

Date: 8/1/2026

Ref: FCC Class II Permissive change for FCC ID: PD9BE211D2

Dear Examiner,

This is to request a Class II permissive change for module approval FCC ID: PD9BE211D2.

Original Approval	Equipment class	FCC: Approval Date	Rule Part
New certification	DSS, DTS, UNII, 6CD, 6VL	2025-08-27	15C, 15E
New certification	DXX	2025-09-15	15C

Permissive change(s)	Equipment class	C2PC Approval Date	Rule Part
Adding Body SAR tested at 42mm, 11mm, 8mm, 5mm	DXX, DSS, DTS, UNII, 6CD, 6VL	2025-09-29	Part §2.1093

Change #1: This Class II permissive change builds upon the approval granted on 2025-09-22, under which SAR configurations were established for antenna-to-user separation distances of 42 mm, 11 mm, 8 mm, and 5 mm.

This filing introduces power optimization for the 11 mm, 8 mm, and 5 mm separation distances while maintaining compliance with RF exposure requirements (full power at 40 mm configuration remain unchanged). SAR compliance conditions are derived from modular stand-alone evaluations, establishing minimum separation distances of 5 mm, 8 mm, and 11 mm, each with a maximum reported SAR value ≤ 0.8 W/kg (1g) for mixed mobile/portable conditions according to KDB 447498 D01 General RF Exposure Guidance v06 and KDB 616217 D04 for Laptop and Tablets v01.

Benjamin Lavenant
Wireless regulatory Engineer
Intel Corporation

Intel Corporation S.A.S.

425 Rue de Goa – Le Cargo B6 – 06600 Antibes – France
Tel. +33 (0)4 93 00 14 00 - Fax +33 (0)4 93 00 14 01

SAS au capital de 5 208 026,16 Euros – RCS Nanterre 302 456 199 – Siret 302 456 199 00256 - TVA FR54302456199