



Date: 19 May 2023

Federal Communications Commission
7435 Oakland Mills Road
Columbia MD 21046

C.C.: Kiwa Netherlands B.V., Dept. FCC TCB
Wilmersdorf 50
7327 AC Apeldoorn
The Netherlands

Subject: Requesting Class II permissive change for FCC ID: RWO-RZ090368QCNFA
To Whom It May Concern:

The purpose of this letter is to request a Class II Permissive change for
FCC ID: RWO-RZ090368QCNFA, original granted on 08/03/2021, 04/06/2022.

The major change field under this application is:

1. The subject approved module is being used in a portable configuration- a Notebook (Brand name/Model: RAZER/ RZ09-0482), the distance between antenna and human body is 0 mm and the original module report the distance is 20 mm. SAR testing was performed to demonstrate RF compliance.
2. The difference compared with the original module design is antenna change. Two groups antennas are used for the subject approved module in the Notebook Computer as below listed.
Original module:



Antenna Set	RF Chain No.	Brand	Model	Antenna Net Gain (dBi)	Frequency Range	Cable Loss (dB)	Antenna Type	Connector Type	Cable Length
1	Chain0/1	HONGBO	260-25094	3.53	2.4~2.4835 GHz	0.76	PIFA	i-pex(MHF 4L)	300mm
				3.06	5.15~5.25 GHz	1.16			
				3.07	5.25~5.35 GHz	1.18			
				4.81	5.47~5.725 GHz	1.2			
				4.2	5.725~5.850 GHz	1.27			
2	Chain0/1	HONGBO	260-25083	5.09	5.850~5.895 GHz	1.29	PIFA	i-pex(MHF 4L)	300mm
				5.14	5.925~6.425 GHz	1.32			
				5.09	6.425~6.525 GHz	1.35			
				5.16	6.525~6.875 GHz	1.4			
				5.12	6.875~7.125 GHz	1.45			
3	Chain0/1	HONGBO	260-25084	3.22	2.4~2.4835 GHz	0.5	Monopole	i-pex(MHF 4L)	200mm
				3.35	5.150~5.250 GHz	0.76			
				3.42	5.250~5.350 GHz	0.78			
				4.77	5.470~5.725 GHz	0.81			
				4.72	5.725~5.850 GHz	0.85			
				4.71	5.850~5.895 GHz	0.86			
				4.75	5.925~6.425 GHz	0.87			
				4.29	6.425~6.525 GHz	0.91			
				4.81	6.525~6.875 GHz	0.96			
				4.74	6.875~7.125 GHz	0.98			

Notebook : Antenna Type :Main Antenna / Aux Antenna :PIFA

Ant.	Brand	Model	Type	Connector type	Frequency Range (MHz)	Gain (dBi)
Main	Amphenol Taiwan Corporation	BY5964-16-001-C	PIFA	IPX4	2400-2500	3.16
					5150-5350	2.76
					5470-5725	4.24
					5725-5850	3.94
					5850-5895	3.45
					5925-6425	4.57
					6425-6525	4.11
					6525-6875	3.71
					6875-7125	4.37
Aux	Amphenol Taiwan Corporation	BY5964-16-002-C	PIFA	IPX4	2400-2500	3.09
					5150-5350	2.71
					5470-5725	4.33
					5725-5850	3.96
					5850-5895	3.72
					5925-6425	3.27
					6425-6525	3.25
					6525-6875	3.46
					6875-7125	2.95

- For the Notebook , since it is client without DFS radar detection capability, detection threshold as set to the module remains identical, and would deactivate the link as it is operated with AP only, DFS test can be excluded.
- Module has been assessed with 0dBi for the contention based protocol, so that the filing does not re-evaluate this part.



5. Reduce the Output Power through software, and SAR measurement was evaluated.
6. The host does not support the beamforming and carrier aggregation mode (non-contiguous).

Please contact me if you have any questions or need further information regarding this application.

Your sincerely,

A handwritten signature in blue ink, appearing to read 'Johnsen Tia', is located below the 'Your sincerely,' text.

Johnsen Tia
Associate VP, Regulatory & Compliance
Johnsen.tia@razer.com

Razer Inc.
9 Pasteur, Suite 100, Irvine, CA 92618, USA.

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