Justification Letter

Date: February 12, 2018

To Whom It May Concern:

We, hereby apply for Class II permission change to the approved product under FCC ID: TX2-RTL8821CE (IC:

6317A-RTL8821CE), to portable category when applied in the laptop platform, Model Name: Lenovo ideapad

330S-14IKB, 81F4; Lenovo ideapad 330S-14AST, 81F8 due to the design of the platform resulting in less

than 20 cm distance to human body, we have tested the platform with the FCC ID: TX2-RTL8821CE (IC: 6317A-

RTL8821CE) device for SAR. Radiated emission testing was not additionally performed due to the following:

• The product with FCC ID: TX2-RTL8821CE (IC: 6317A-RTL8821CE) module was assessed compliant to

radiated emission limits per 15.247 and 15.407 in its initial FCC approval, and RSS-247 issue 2 in its initial

IC approval.

The product with FCC ID: TX2-RTL8821CE (IC: 6317A-RTL8821CE) module was assessed compliant to

DFS limits per 15.407 in its initial FCC approval, and RSS-247 issue 2 in its initial IC approval.

The host antenna is designed for a lower peak gain in the intentional transmit frequency bands and therefore

radiated performance in the intentional frequency bands is expected to be lower than that measured in the

original modular approval.

Please kindly review the application documents submitted and grant approval for this permissive change

application.

Mandy Liu/ Section Manager

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Compliance Certification Services (Kunshan) Inc.