

CONFIDENTIALITY REQUEST CONTAINED WITHIN

23 January, 2001

Communications Certification Lab
1940 West Alexander Street
Salt Lake City, Utah 84119

Attention: Mr. William S. Hurst

Re: Application for Unlicensed Low Power Transmitter Certification (Part 15, Subpart C) -
E9U6188

Motorola, Inc., Integrated Information Systems Group, 8201 E. McDowell Rd, Scottsdale, Arizona 85252 herein submits this application for Equipment Authorization under FCC Rule Part 15, Subpart C for this Unlicensed Low Power Transceiver sub-assembly, FCC ID: E9U6188. The Parallel Card Acceptance Device (CAD) is manufactured by Motorola WSSD located at 1301 East Algonquin Road, Schaumburg, IL 60196. This application is being submitted to CCL under the FCC Public Notice, DA 00-1223, allowing Telecommunication Certification Bodies (TCB) to certify specific equipment including Unlicensed Radio Frequency Devices under Scope A1. The Parallel CAD is very similar to the Serial CAD and the CAD+ subassemblies which have been previously FCC certified as FCC ID: ABZ89FT7601 and FCC ID: ABZMCAD200, respectively.

This application is submitted in accordance with FCC Public Notice, DA 00-1407, for Part 15 Unlicensed Modular Transmitter Approval. This Low Power transceiver module complies with the requirements specified in DA 00-1407 as described below:

- 1) **Inherent RF Shielding** - The Parallel CAD has board mount RF shields to minimize emissions for compliance to FCC Part 15, Subpart C requirements.
- 2) **Buffered modulation/data inputs** - The data interfaces include RC filtering as illustrated on page 4 of the schematics contained in Exhibit 5. Additional buffering is integrated into the data processing components specifically the microprocessor, i.e. MFC5204 (U25).
- 3) **Power Supply Regulation** - The Parallel CAD module contains on board regulators and filtering circuitry to generate the various voltages required by the CAD circuitry. A +12VDC from the terminal is used as the source to generate the +5V, +5V_A, and RFA_PWR voltages.
- 4) **Antenna Requirements per Section 15.203** - The module uses a unique 6 wire, 100 mm, interconnect cable/connector for the 104x67 mm Antenna Board. Additionally, the final integration of the module will make this antenna interface inaccessible to the final user.
- 5) **Tested in Stand-Alone Configuration** - The Parallel CAD module was tested as a stand-alone device and was compliant with FCC Part 15, Subpart C, requirements as detailed in the Test Report contained in this application as Exhibit 6. The module is intended to be powered from a +12 VDC source provided by the host terminal.
- 6) **FCC ID Label** - Exhibit 1 contains the labelling requirements of the module and the users manual, Exhibit 8, contains instructions for carrying the FCC ID to the exterior of the final product.

- 7) **Comply with Specific Rules and Operation Requirements** - The module was compliant with FCC Part 15, Subpart C, specifically Section 15.225 for operation in the band of 13.553-13.567 MHz. The test results are detailed in the Test Report of Exhibit 6.
- 8) **RF Exposure Requirement Compliance** - The Parallel CAD complies with the Maximum Permissible Exposure (MPE) levels of ANSI/IEEE C95.1-1992 and 47 CFR 1.1310, Table 1 for an uncontrolled environment. Test Results contained in Exhibit 11.

In addition to confidentiality for the entire application prior to grant (per 47CFR0.457(d)(1)(ii)), Motorola requests, pursuant to 47CFR0.459, post-grant confidentiality for identified sections of the filing material contained in this application with this material being withheld from public inspection following the grant of this authorization. This material includes Exhibit 5, Schematic Diagram, and Exhibit 12, Theory of Operation, including any Antenna PCB photos or layout drawings. Specifically, these exhibits contain information relating to circuit function and complexity that could be of benefit to competitors. This material contains Motorola trade secrets and confidential information which is not customarily released to the public and which, otherwise, is not generally available to the public.

Please charge the following VISA Card, xxxxxxxxxxxxxxxxxxxxxxxxx, for the appropriate fees of \$940.00 for the application and \$135.00 for the confidentiality request. Please contact me by telephone at (480) 441-3725, by facsimile at (480) 441-3625, or by email at Gil.Estrella@motorola.com if there are any questions or additional information needed regarding this filing.

Sincerely,

Gil Estrella
EMC Engineer
Motorola IISG