

To: Joe Dichoso
From: Dave Fry, null
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Regulatory Engineer

Re: FCC ID EHARFID2450PCC-5
Applicant: Intermec Technologies Corporation
Correspondence Reference Number: 20587
731 Confirmation Number: EA101090

Comments are indented with bold Italics text.

1) With regard to RF safety, the warning statements must include that the device cannot be used with other co-located transmitters.

Please change the language from "close proximity" to indicate that the device cannot be used with co-located transmitters

Appendix N was incomplete. Please make sure it is corrected and complete.

Sorry about the mix-up. The Appendix M and N has been revised to address the co-located transmitters as recommended and these appendices verified for completeness.

2) Only the 6100 Hand held terminal can be approved. Future hand held terminals will require a Class II permissive change with new RF Safety evaluations.
The RF safety distances might change with each new hand held terminal.
The warning statement for the 6100 should include warning for the 0.5 cm rf safety distance configuration.

This was not addressed. The same reply to item 1 above was submitted

It is unfortunate the FCC has taken this stand. Burdens for approvals on essentially identical antennas for use in hand held terminals would cost thousands with only millimeters of changes in compliance distances. Retesting and measurement uncertainties related to SAR testing will introduce greater differences in SAR than implementing these same antennas in products operated in the hand. Considering the safety requirements for Canada and Europe are under Self-Declaration, the FCC needs to reconsider their policies.

For additional hand held terminals to use the antennas approved for the 6110 Intermec will repeat SAR testing and submit Class II Permissive changes as stated above.

The Appendix N has been revised to clarify the 0.5-cm safe distance. Please be advised the 6100 family of terminals represents 6100 as well as 6110. These units have identical exterior and PCMCIA slots access. There are processor, memory and display upgrades that differ and are represented by the 61XX family of terminals. Future units using this case configuration will be 6120, 6125, etc, etc. The 0-dBi antenna shown in the SAR report will always be used when the 2450 RFID PC card is installed. The placement of the antenna and radio is identical in all product variants of the 6100 terminal. Please indicate on the grant that all variants of the 6100 terminal are covered.

4) How do you ensure compliance with the remote antennas at the higher output power (30 dBm)?

The calculations must be made with EIRP not ERP.

The MPE calculations are now shown in EIRP as shown by MPE EIRP data sheets.

FYI...

(hand held ONLY w/ 6100, 0dBi antenna; laptop use with remote antennas at 20 cm, no co-location, modular approval)