

**NORTHWEST EMC, INC.**

22975 NW Evergreen Parkway, Suite 400  
Hillsboro, OR 97124

February 23, 2004

Dear Application Examiner:

On behalf of Intermec Corporation, Northwest EMC Inc is submitting this application for the Class II Permissive Change of Intermec's RFID radio module, FCC ID: EHARFID915PCC-6. Approval is sought for use with other co-located radios. Please reference the attached email from the FCC that approves the TCB eligibility for processing this type of application.

The RFID is a Spread Spectrum radio module installed inside Intermec's Model IP3. The IP3 is an optional pistol grip accessory that attaches externally to the bottom of Intermec's 700C. The 700C is a handheld computer that contains three co-located radio modules (CDMA, 802.11(b) and Bluetooth). All three radios have been previously certified for mobile, co-located use in the 700C (FCC ID: HN2SB555, FCC ID: HN22011B, and FCC ID: HN2ABTM3-2). Another version of the 700C contains the same 802.11(b) and Bluetooth radios but with a GPRS radio instead of a CDMA radio. The GPRS radio module was granted certification as a portable device under FCC ID: EHA700C-SMC45-1. Please note that the CDMA and GPRS radios are never installed in the same 700C.

This Class II application demonstrates compliance with FCC requirements while the RFID is co-located with the other radios in the 700C. In this configuration, the 700C cannot be used in any body-worn configurations (holsters, belt clips, lanyards, etc). Also, it cannot be used as a cell phone near the head. In this configuration the CDMA radio, or GPRS radio is for wide area network (WAN) data transmission only.

Since the IP3 uses the same IRDA interface port as the Bluetooth radio, the Bluetooth and RFID radios cannot transmit simultaneously (see Intermec's attestation letter). All other radios can transmit simultaneously. Each radio transmits through its own antenna.

The technical reports and RF Exposure exhibits are supplied in support of the co-location condition described above

The technical reports and exhibits demonstrate compliance with FCC rules 47 CFR 15.247.

Your efforts in reviewing this application are greatly appreciated.

Best regards,



Greg Kiemel, Director of Engineering  
Northwest EMC, Inc.

Return-Path: <Tim.Harrington@fcc.gov>  
Received: from gatekeeper2.fcc.gov (gatekeeper2.fcc.gov [192.104.54.4])  
by nwemc.nwemc.com (8.10.2/8.10.2) with ESMTP id hBINeJE19974;  
Thu, 18 Dec 2003 15:40:20 -0800  
Received: by gatekeeper2.fcc.gov; id SAA02464; Thu, 18 Dec 2003 18:40:13 -0500 (EST) Received: from unknown(165.135.234.4) by  
gatekeeper2.fcc.gov via smap (V5.5)  
id xmaa02420; Thu, 18 Dec 03 18:40:12 -0500 Received: from P2PXCS01.fccnet.win.fcc.gov (p2pxcs01.fccnet.win.fcc.gov [165.135.240.60])  
by smarthost2.fcc.gov with ESMTP; Thu, 18 Dec 2003 18:40:13 -0500 Received: from P2PXMBO3.fccnet.win.fcc.gov ([165.135.240.48]) by  
P2PXCS01.fccnet.win.fcc.gov with Microsoft SMTPSVC(5.0.2195.6713);  
Thu, 18 Dec 2003 18:40:12 -0500  
X-MimeOLE: Produced By Microsoft Exchange V6.0.6487.1 content-class: urn:content-classes:message MIME-Version: 1.0  
Content-Type: text/plain;  
charset="us-ascii"  
Subject: RE: Intermec 700C questions  
Date: Thu, 18 Dec 2003 18:40:12 -0500  
Message-Id: <8C0103F2896CF143AA78F20B29FF281FCEB7F6@p2pxmb03.fccnet.win.fcc.gov> Thread-Topic: Intermec 700C questions  
Thread-Index: AcOzqGGPyKcO/wksQtyG2LJjg8UHQSFWF0w From: "Tim Harrington" <Tim.Harrington@fcc.gov> To: "Greg Kiemel"  
<gkiemel@nwemc.com>,  
"Tim Harrington" <Tim.Harrington@fcc.gov> Cc: <dghizzzone@nwemc.com>, <kvalleen@nwemc.com> X-OriginalArrivalTime: 18 Dec 2003  
23:40:12.0094 (UTC) FILETIME=[47872DE0:01C3C5C0] Content-Transfer-Encoding: 8bit  
X-MIME-Autoconverted: from quoted-printable to 8bit by nwemc.nwemc.com id hBINeJE19974 X-UIDL: M\!aK8"!3->!!HCb!"

- 1) pistol is hand-held portable condition - C2pc can be used with portable grants to allow co-location for hand-held use.
- 2) TCB can do the C2pc's.

From: Greg Kiemel [mailto:gkiemel@nwemc.com] Sent: Tuesday, November 25, 2003 6:03 PM To: Tim Harrington  
Cc: dghizzzone@nwemc.com; kvalleen@nwemc.com Subject: Intermec 700C questions

Tim,

Thanks for speaking with me today. The subject devices are:

FCC ID: HN2SB555-2 limited modular approval, portable, CDMA radio used in 700C  
FCC ID: HN22011B-2 limited modular approval, portable, 802.11b radio used in 700C  
FCC ID: EHARFID915PCC-6 limited modular approval, handheld, 900 MHz FHSS used in Model IP3 pistol-grip RFID Tag reader.

The IP3 RFID tag reader attaches to the bottom of the 700C. In this configuration, the 700C cannot be used in any body-worn configurations (holsters, belt clips, lanyards, etc). Also, it cannot be used as a cell phone near the head. In this configuration the CDMA radio is for wide area network (WAN) data transmission only.

Intermec would like to make Class II permissive changes to the subject grants for this new exposure condition.

- 1) Can we add a mobile exposure condition (the co location of the IP3) to the portable grants only (rather than to the mobile grants, or both mobile and portable grants)? Intermec would rather label all 700Cs with the portable FCC IDs.
- 2) If the answer to #1 is yes, can a TCB issue the Class II even though the TCB exclusion list prohibits a TCB from issuing the portable grants (dominate xmitter requires SAR, non-dominate co-located xmitter > 5mW)?  
Since the change is for a handheld exposure condition that does not require SAR data, I would think the answer is yes. I would like your confirmation.

Thank you for your attention to this matter.

Best regards,

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