



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

March 26, 2007

RE: Pison Teklogix Inc.

FCC ID: GM375273RADA

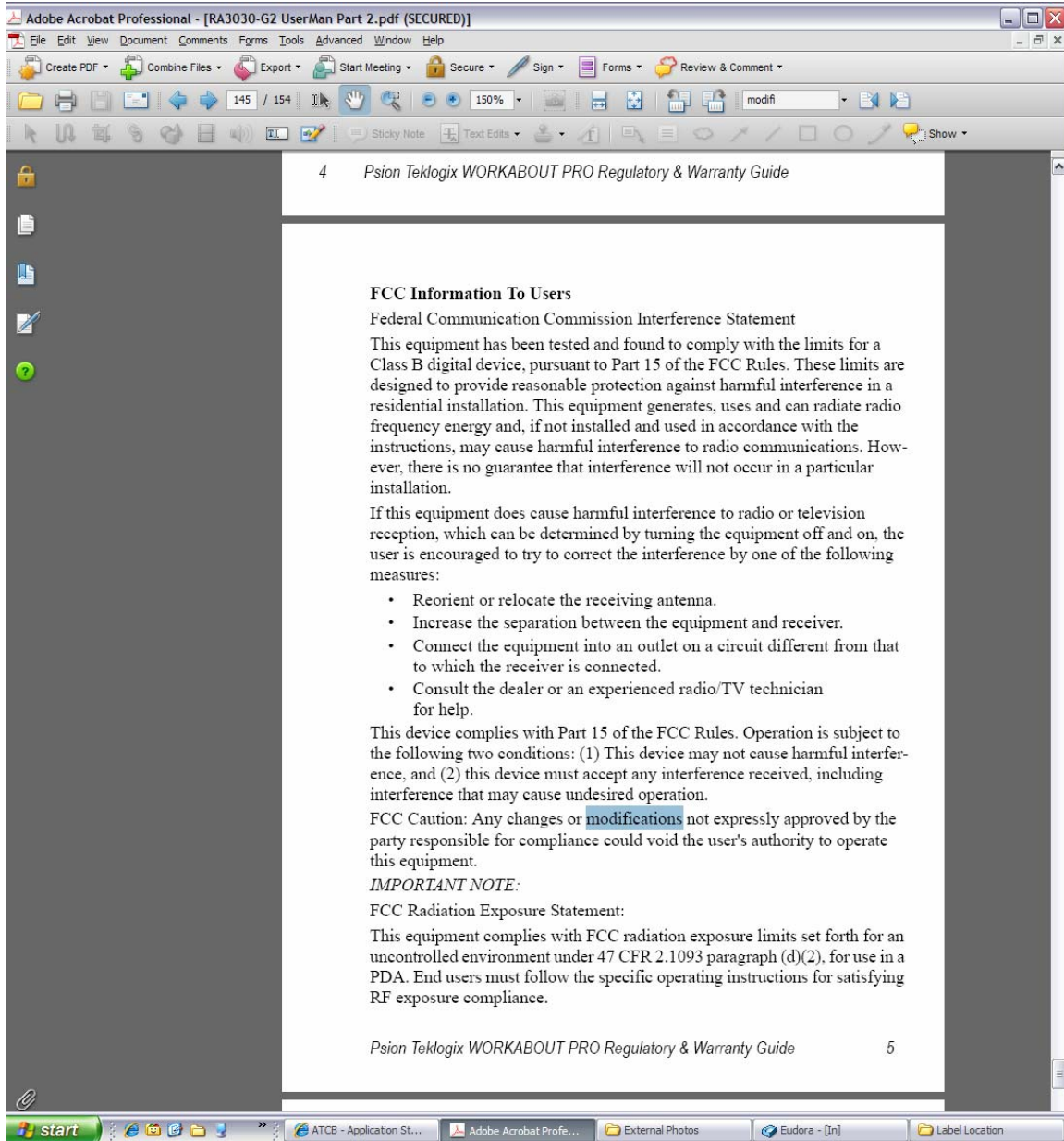
After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) I currently do not have any information regarding the tune-up procedure for this device.
- 2) There is still confusion on the labeling. Please explain the labeling of the host. If more than one label gets applied to the external portion of the device, please clarify the location photograph. The device should show the "Contains FCC ID:" for both co-located transmitters. Currently it appears that only the BT label would be externally viewable.
- 3) Regarding labeling of the host. The label for the host appears to be being placed under a battery. Please note the following which should be supported in the application.
Currently items in Blue have not been adequately supported in the application:

Recent information released from the FCC is as follows:

As an option to placing the FCC label on the exterior of the device, the FCC label can be placed in a user accessible area if the following conditions are met.

- a) The device is handheld.
 - b) **The FCC identifier is visible at the time of purchase. Marketing the device without the battery installed when the label is in the battery compartment is acceptable. The FCC identifier on the box or additional documentation directing the user as to where to find the FCC label also satisfies this requirement.**
 - c) The user accessible area must not require any special tools for access and the FCC label must not be placed on a removable part.
 - d) The FCC identifier, model no. or FCC logo must be on the label and must meet all general labeling requirements or policies that apply for Certification, Verification or DOC; e.g. for Certification, for handheld devices, the identifier must go on the label but the two part warning statement in Section 15.19(a)3 can go in the manual.
- 4) The most recent updated manual lost a lot of FCC information, specifically 15.105, 15.21, 2 part statement of 15.19, RF exposure information, no-colocation information, and IC information seen originally as follows:



Adobe Acrobat Professional - [RA3030-G2 UserMan Part 2.pdf (SECURED)]

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FCC Information To Users

Federal Communication Commission Interference Statement

This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference in a residential installation. This equipment generates, uses and can radiate radio frequency energy and, if not installed and used in accordance with the instructions, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation.

If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one of the following measures:

- Reorient or relocate the receiving antenna.
- Increase the separation between the equipment and receiver.
- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
- Consult the dealer or an experienced radio/TV technician for help.

This device complies with Part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

FCC Caution: Any changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate this equipment.

IMPORTANT NOTE:

FCC Radiation Exposure Statement:

This equipment complies with FCC radiation exposure limits set forth for an uncontrolled environment under 47 CFR 2.1093 paragraph (d)(2), for use in a PDA. End users must follow the specific operating instructions for satisfying RF exposure compliance.

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Adobe Acrobat Professional - [RA3030-G2 UserMan Part 2.pdf (SECURED)]

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This transmitter must not be co-located or operating in conjunction with any other antenna or transmitter.

Some equipment in hospitals and aircraft are not shielded from radio frequency energy. Do not use the device onboard aircraft, or in hospitals, without first obtaining permission.

Do not use near pacemakers. The product may affect the operation of some medically implanted devices such as pacemakers, causing them to malfunction. Avoid placing your product next to such devices. Keep a minimum distance of 20 cm between the device and the product to reduce the risk of interference. If you have any reason to suspect that interference is taking place, turn off the device and contact your cardiologist for assistance.

Note: To maintain compliance with the FCC RF exposure guidelines, if you wear the device on your body, use the Psion Teklogix approved carrying case.

Use of non-approved accessories may violate FCC RF exposure guidelines.

Emissions Information For Canada

This Class B digital apparatus meets all requirements of the Canadian Interference-Causing Equipment Regulations. When using the 802.11 radio option, to prevent radio interference, this device is intended to be operated indoors and away from windows to provide maximum shielding. Equipment (or its transmit antenna) that is installed outdoors is subject to licensing.

Cet appareil numérique de la classe B respecte toutes les exigences du Règlement sur le matériel brouilleur du Canada. En cas d'utilisation du module radio 802.11, afin d'éviter toute interférence radio avec le service autorisé, l'appareil doit être utilisé à l'intérieur, tout en tant éloigné de toute fenêtre afin de garantir le maximum de protection. Si cet équipement (ou son antenne émettrice) est installé à l'extérieur, il est alors soumis à licence.

Warning for Australia

The user needs to switch off the device when exposed to areas with potentially explosive atmospheres such as petrol stations, chemical storage depots and blasting operations.

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- 5) Manual should clearly explain spacings and body worn conditions (non-metal, spacings, etc.)
- 6) Page 14 of the manual clearly shows 2 types of batteries. FCC requires all types of batteries to be tested for SAR. This does not appear to have been done.
- 7) Kindly explain why the manual clearly identifies 802.11 capability if this application does not cover this.
- 8) It is uncertain if device was properly operational at maximum power. There appears to be a large difference between maximum capable power and the powers measured. Please see the following:

| | Test Report Max Power Cond dBm | Siemens Information Max. Power dBm |
|-----------|--------------------------------------|--|
| 850 | 31.54 | $33 + 2 \text{ dB} = 35$ |
| 850 Edge | 23.10 | $27 + 3 = 30$ |
| 1900 | 29.03 | $30 + 2 = 32$ |
| 1900 Edge | 22.0 | $26 + 3 = 29$ |

- 9) Your response mentions only one scanner will currently be covered by this application. However internal, external photos, and the photos for test photos and SAR currently do not cover any scanner. External photos do not appear to support a scanner. If this is covered, kindly label photographs appropriately and show that this has been tested and covered by this application.
- 10) The Manual still mentions a soft shell holster (which is designed to be body worn and also hold the device in a non-standard configuration). The arrangement does not appear to be covered currently in this application. Additionally, note that the users manual does not appear to address body worn distances and should be corrected. Note that tested spacing are only valid for body worn accessories that maintain that distance and do not contain any metal. Please review.



Timothy R. Johnson
Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.