



Printer Systems Division

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Monarch®
Products & Services

December 4, 2009

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Ref: FCC ID: GU6-SDCCF20G / DA 00-1407 Released: June 26, 2000
PART 15 UNLICENSED PORTABLE MODULAR TRANSMITTER APPROVAL

To Whom It May Concern:

Our FCC ID: GU6-SDCCF20G wireless card can be used inside any device that has a Compact Flash card slot, however it is the intention of the Avery Dennison RIS LLC not to sell it on it's own, but to use it only in our model 6039 printer scanner. Below are the eight elements a module is required to meet to comply with Part 15, Unlicensed Modular Approval notice, DA 00-1407. Also included are our arguments on why our module meets the requirements.

1. The modular transmitter must have its own RF shielding.
 - The Transmitter provided by Summit (TWG-SDCCF10G) is provided with an enclosure that provides the required shielding.
2. The modular transmitter must have buffered modulation/data inputs
 - The inputs are buffered CMOS and the data is processed by a microprocessor in the Summit module, thereby eliminating excessive data rates or over modulation.
3. The modular transmitter must have its own power supply regulation.
 - The module has it's own on board regulator and will be supplied a regulated +5 volts in our final product.
4. The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c).
 - The antenna is built into the module and not changeable.
5. The modular transmitter must be tested in a stand-alone configuration
 - Base unit was tested stand alone
6. The modular transmitter must be labeled with its own FCC ID number.
 - This module will only be used in Avery Dennison RIS LLC. Model 6039 which will have a label on it stating the printer scanner stating the module is inside.



7. The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacture must provide adequate instruction along with the module to explain any such requirements
 - All of the timing is controlled by software in the Summit module and is not adjustable by the user.
8. The modular transmitter must comply with any applicable RF exposure requirements.
 - Through SAR testing Avery Dennison RIS LLC has confirmed our compliance with RF Exposure limits.

If you have any questions or concerns, please contact me by email at jim.bacher@averydennison.com; phone at 1-937-865-2020; or by fax at 1-937-865-2048.

Sincerely,

A handwritten signature in black ink that reads "James A. Bacher".

James A Bacher
Senior Engineer
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