

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

May 5, 2004

RE: Paxar

FCC ID: GU66037LA4121

This appears to be a filing for a new FCC ID and not a Class II PC. Therefore I have a number of comments on this Application.

1.) Please provide a detailed Block Diagram of the transmitter.

Response: As already agreed upon, the block diagram of the transmitter was included in the original upload.

2.) Please provide Schematics of the transmitter.

Response: As already agreed upon, the schematics of the transmitter were included in the original upload.

3.) Please provide an MPE estimation for the prescribed RF Category "Mobile" distance of 20cm.

Response: The EUT can be body worn through the use of a belt clip, and is therefore considered portable. The EUT was sent to Celltech Labs for evaluation. The result of the evaluation was the following (sent from Jon Hughes via email, Thursday 1/22/04 6:05 PM):

Due to the very low duty cycle of this device, the calculated source-based time-averaged output power falls well below the minimum low threshold power of 24.49 mW, as defined in the July 2002 TCB exclusion list. As a Part 15 device in which routine SAR evaluation is not mandatory unless the source-based time-averaged output power is greater than the low threshold, routine SAR evaluation is not required for this unit.

4.) Please review 15.247. Several required tests are missing.

Response: Please excuse the oversight, and refer to the revised test report uploaded with this response.

5.) Please provide details on the sensor used for your RF Power measurements. Be sure that measurements were made using a sensor with a "video bandwidth" greater than the 6dB BW of the transmitter emission.

Response: The power measurements were made with an Agilent Technologies E9323A Peak and Average Power Sensor. We have verified 802.11b measurements with this sensor using the diode detector/signal generator substitution method. I believe you verified the same thing when you performed some experiments using ADT in Taiwan last year (please reference your email of June 19, 2003 to Joe Dichoso - subject "Peak Power Measurement Test Result").

6.) Some of the internal photographs are not acceptably clear. Please review and resubmit as needed.

Response: Please refer to the revised internal photograph exhibit uploaded with this response.

7.) The label appears to be on a removable cover. This is not permitted under FCC rules. See 2.925(d) for additional information.

Response: As this is a small portable device, all covers are removable. The cover is a key element of holding all of the parts in place. If the user removes the cover, the unit will basically fall apart and cease to work. The unit cannot be used without the cover. Only a skilled technician, or one of our trained assembly people, would be able to reassemble the unit.

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8.) Required information under 15.21 and RF Exposure warnings appear to be missing from the Manual. If it does exist, my apologies – kindly indicate where these items may be found.

Response: The normal product does not have any wireless cards. Like a portable PC, the printer has a PCMCIA card slot that one can plug any PCMCIA card into, including cards like memory cards. A number of our customers do not even have PCMCIA cards in their units. When it has a memory card, it cannot have a wireless card. As a result, we keep the main product manual generic so it applies to all versions of the product. When we sell a unit with a wireless card in it we add two items to the box. One is the RF warning sheet from the manufacturer of the wireless card, and our own RF warning. We include the original company's RF warning in case they remove the wireless card from the unit and put it in a PC. A copy of the current RF warning we provide is provided with this response. Both of these address their issue.

The only real difference between our printer and a portable PC is that on a portable PC, the card slot is open to the end user, where our card slot is not. We had to seal the PCMCIA card slot as our customers' employees were stealing the cards for use on their home systems.

9.) The Operational Description exhibit is insufficient. Please provide a detailed description of how the transmitter operates per 2.1033(b)(4).

Response: Please refer to the operational description uploaded with this response.

10.) The Agent Authorization received at ATCB is blank. Please review.

Response: My copy is not blank. Please try the letter uploaded with this response.

11.) Please indicate the overall location of the antenna and transmitter for this product. Photographs showing the transmitter installation and it's connection to the internal stripline antennas would be useful.

Response: Please refer to the revised Internal Photograph exhibit uploaded with this response.

12.) The PCMCIA card must be in an inaccessible location to the end user. Otherwise, the Symbol FCC ID labeling should be removed from this product. Please comment.

Response: The PCMCIA card is in fact inaccessible to the user. This fact is stated in the original operational description letter.

13.) Page 66 to 69 of the Manual seems to indicate this device is user installable. This is not permitted under FCC rules.

Response: The original Symbol LA-4121 user's manual was submitted with this application for informational purposes. The card as used in this application is not accessible to the end user. We have removed the Symbol manual from the user's manual exhibit.

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14.) Since the end user will be writing and implementing much of their own DOS based programs, is it possible for the equipment to be programmed to transmit on channels 12 and 13?

Response: Symbol will not provide us with the information to control the card at that level. They will only let us have software that will run in a PC. None of Symbols config/test software will run on our DOS board. Without having the software specifications to control the card, it would be impossible to do. Even as a significant partner with Symbol, they will not provide it to us, so I doubt if they would provide it to any of the VAR's or our customers.

William H. Graff

President and Director of Engineering

mailto: whgraff@AmericanTCB.com

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.