

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

May 12, 2004

RE: Paxar

FCC ID: GU66037LA4121

I have a few additional comments on this Application.

1.) Your responses to item #8 of my comments of May 05, 2004 indicate this equipment can be operated with any PCMCIA card. However, the FCC ID referred to in this filing covers the entire wireless product and printer. Please indicate how only the wireless PCMCIA card specified in this filing and no other will be used under this FCC ID with this device.

Response: Paxar has a fixed build of materials that combine the right labels with the right cards. Paxar is an ISO9001:2000 registered company, so the controls on the labels and OEM modules are pretty tight. Jim Bacher reviews and signs off on all Engineering Change Notices, so he has full control over all changes. If someone puts a card into it in the field, he voids the warranty and it becomes his issue, not Paxar's, just as it would be with a portable PC. Paxar has no control over what someone puts into the product once it has left the building, but what happens to the product at Paxar can be, and is, controlled.

2.) In addition, your description about the ease in which PCMCIA cards can be swapped tends to negate your response to item #7. Please note that all FCC identifiers must be permanently affixed to the device as prescribed in Parts 2 and 15 of the Rules.

Response: When Paxar receives the cards, they have the original manufacturer's FCC ID on them, and Paxar leaves it in place. Due to its small size and the nature of the unit, all parts are replaceable. The same thing would be true for any portable product, be it a PDA or a scanner or even a portable PC. The Paxar unit is not field repairable. It is returned to the factory for repairs. Most people who tear one apart are never able to put it back together in working condition. Once again due to Paxar's ISO certification, the repaired unit always meets the print when it is returned to the customer. In today's world everything is modular, the concept of a permanent part is no longer valid on many products.

3.) Please provide graphical data to support your RF duty cycle as described in the RF Exposure exhibit.

Response: Paxar's typical customer prints 3,000 labels on the printer in a 24 hour day. If one assumes just an 8 hour day, that is one label every 10 seconds. Typically the user would scan a barcode, which would cause the unit to send a less than a 20 character data stream to the main computer. The main computer would process the data and send back data to be printed. As the unit contains fixed label formats, the typical response back is anywhere from 4 to 60 characters. The user would print the label and apply it. They would then scan the next barcode. This means that during any 10 second period less than 100 characters will be transferred through the wireless network. During the test Paxar sent 64 characters ten times a second, or 6,400 during a 10 second interval. This is significantly greater transmit time than the unit will see in actual use. As each application is custom written and implemented, it is impossible to provide a graphical plot.

4.) Since it is your contention that SAR testing is not required, both your "Portable" and "Mobile" exposure statements in your "Regulatory Compliance" supplement to the manual are unsubstantiated and should be removed.

Response: Paxar will remove the wordings from the insert.

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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.