



19-Mar-02

Re: FCC ID H9PLA4137

Subject: Response to Correspondence Reference Number: 22377  
(731 Confirmation Number EA953106)

Joe,

I have responded to all your questions by the ITEM numbers.

*1) If Intel wants their own grant, they have to file separately with their own FCC identifier. Suggest filing under 2.933 AFTER grant. These exhibits will be removed.*

[Response ITEM 1](#)

The request for INTEL will be refiled at a later date.

*2) Justify modular approval and provide appropriate cover letter and labeling per the modular public notice. A module is a device that will be placed in other devices.*

[Response ITEM 2](#)

The request for modular approval is withdrawn at this time.

*The following SAR questions were not addressed from the previous request. I have numbered them for reply purposes.*

*SAR RT:*

*FCC comments on:*

*12/28/01 cover letter*

*3/11/02 phone call between M. Luksich-Symbol and T. Harrington-FCC*

*3/11/02 email from M. Luksich to J. Dichoso, T. Harrington*

*3) In general FCC cannot issue "module grant" for portable configurations unless the output is substantially low and there are no SAR issues so that SAR tests are not required to show compliance for whatever product the module is used for. For SAR tests with sleeve dipole in this filing, some demonstration or final product configuration info is needed. At present it is not clear whether SAR may increase or decrease in final devices.*

[Response ITEM 3](#)

The request for modular approval is withdrawn at this time.

The final configuration that Symbol Technologies Inc. will sell is the card with the sleeved Dipole. Symbol Technologies Inc. limit of responsibility for the regulatory approval is limited to the device at the time of sale.

Any modifications changes or inclusions to the devices once it is sold are solely the responsibility of the party, individual, or company purchasing the radio. Any additional or required approvals resulting from the incorporation of the radio in a host are entirely the responsibility of the party, individual, or company purchasing the radio.



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**Symbol Technologies, Inc.**

Symbol Technologies Inc. will continue to assist the purchasers of our products with any information or advice with regard to regulatory requirements resulting from the incorporation of our products but assumes no liability or responsibility for the compliance of any entity outside of Symbol Technologies Inc.

Symbol Technologies Inc. has developed a Regulatory Integration guide that specifically addresses the issues and regulatory requirements of manufacturers that do incorporate Symbol Radios into their products. (See Draft Integration guide)

*4) If module application is for hand-held and hand-operated devices only, this could be granted for hand-held and hand-operated devices only with limited modular approval, and applicant would be required to coordinate/inform its OEMs about the specific final product operating requirements. If there are body-worn configuration, present SAR data may not apply.*

Response ITEM 4

The device will be used in Portable hand held configurations; the SAR data was taken at less than 2 cm to support this request. Symbol has already submitted and received a grant H9PLA4137SPS3046 for a terminal using this radio card.

Currently there are no known plans for body worn configurations of this device.

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*5) Applicant must ensure its OEM can comply with the grant and applicable conditions issued to grantee. FCC rules and procedures to include provision for "Document of Conformity" mentioned in cover letter.*

Response ITEM 5

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The Document of Conformity is Symbol Technologies Inc. public attestation that we comply with the governing regulations.

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*6) We can consider the applicable operating configurations or specific product types supported by SAR tests but applicant needs to define the product type, category and requirements etc. The SAR for the standalone module with a sleeve dipole may not be useful because exposure conditions may change*



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**Symbol Technologies, Inc.**

*when it is incorporated into different final products. FCC cannot approve unknown operating configurations and exposure conditions because RF exposure for portable devices are generally dependently on the final product configuration.*

Response ITEM 6

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*7) If applicant wishes OEMs to take on SAR responsibility, applicant should advise OEMs to file separate applications for their products. Otherwise, applicant should define the category of products it intends to cover with this filing. In that case we can work on the requirements and determine what should be included in a single filing. Without knowing the product configurations, we don't know what is required - test, not test or how to test etc.*

Response ITEM 7

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Regards,

Mark S. Luksich