

Response to comments 01/11/10

4) The original application for this device was tested for SAR. It is not explained or justified why SAR is not performed or provided. Also, the added co-located module is only approved for 20 cm mobile configurations. Do any body worn accessories allow this version to be body worn or is the new design not fit any existing body worn accessories? If this configuration does not support body worn, and strong explanation/justification must be supplied – preferable from the applicant. This should explain the manufactures intent for this configuration, why it is not body worn, support for body worn accessories, etc.

R. The addition of the module FCC ID UZ721121559 with its 6dBi antenna (part of a permissive class II change) will prevent this device from being holstered. The antenna is attached to the far-end of the device (shown in the external photos as the semi circular piece). As the device is no longer holstered it is not considered body-worn and the distance to the body will now exceed 20cm making it a mobile device for RF evaluations.

7) Please confirm this version of the device is only offered by the manufacturer directly and is not a user-upgradable option.

R. This device offers no user upgradable options.

8) Please explain how the device meets the FCC's RF exposure requirements regarding section 8)a)ii) and 5 cm requirement specified. See document provided separately. It would be helpful to show locations of all antennas and distance between as necessary.

R. The original filing internal photos shows that the WLAN and Bluetooth antennas are located on opposite sides of the main display along the chassis. The display is 8.5cm across. The new RFID antenna is located at the end of the semi-circular piece attached to the front part of the device which is greater than 5cm.

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2) In regards to the 5 cm separate distances, the FCC has been asking for more detail to support these distances. Drawing and/or photographs are commonly acceptable. Additionally, this should be the closest point of each antenna to each other. Given the large nature of the new antenna, internal drawing/photographs or other information may be necessary to show its design. If necessary, please let us know if confidentiality is desired due to this information and if necessary, please provide the appropriate confidentiality letter.

R. The antenna separation is slightly greater than 5cm. See Antenna Separation distance.pdf

4) The following does not appear to be addressed from the last comments:
Additionally, please provide information to support this final distance can be maintained during use for this device as it seems > 20 cm is used but the device is hand held. Also, given the values for the RF ID and its nature, can any source based average power be used for these calculations. If so, it would be prudent to provide and also provide sufficient information to support the source based time average values obtained.

R. Because of the nature of the device, having a bar code scanner and RFID, the client contents that the unit, when used as intended, will be used with the arms outstretched, thereby giving the separation distance greater than that required by the MPE calculation. Understand that in the future we will investigate the sourced based average power for the calculations, at this point we are supplying the worst case and hope this will not delay the grant.