



# Washington Laboratories, Ltd.

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February 25, 2005

Mr. Dennis Ward  
American Telecommunications Certification Body Inc.  
6731 Whittier Ave  
McLean, VA 22101

RE: Comments of February 16, 2005  
APPLICATION: HP9MR100A Symbol Technologies, Inc.

Dear Mr. Ward:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

*Gregory M. Snyder*  
Chief EMC Engineer, Wireless/Telco Services Manager

*Brian J. Dettling*  
Documentation Specialist

WLL Project: 8355/6

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1) Please note that the manual states that this module can be placed into handheld devices. Please note that, if such handheld can be placed near the head or worn on the body, this puts the rf exposure class as portable. If this is the case then head and/or body SAR would be required. Please also note that as the conducted power of this device is about 1W and the gain of the antenna is about 6dBi, testing in three hand held hosts may be applicable. Please clearly identify the type handheld devices this module will be used in and please provide SAR test data in the cases where such hand held hosts can be worn on the body.

***R. The User Manual has been revised to include warnings and requirements for RF Exposure. Reference Appendix C of Manual. Information been added to the User Manual reminding end users that it their responsibility to ensure RF exposure compliance as regards to their devices. Please see exhibit "MR100A User Manual 2.23.05.pdf".***

2) FYI - Please note that the manual states 23cm separation while the MPE shows 20cm separation. Please be consistent in the rf exposure issue. While the 23 cm may be used in the manual, please note that this may bring questions from the FCC as to why the distances are different between the MPE report and the manual.

***R. The User Manual has been revised to match the separation distance indicated in the RF Exposure Evaluation.***

3) Please note that the manual needs to contain instructions on placement of the statement “Contains FCC ID: HP9MR100A” on the host.

***R. The User Manual has been revised to include this information.***

4) Please note that you have shown test setup photos that are supposed to be in accordance with ANSI C63.4. However, please note that C63.4 requires that the EUT be placed in the center laterally on the table top (i.e section 6.2.1.1 of ANSI C63.4 2003 – please see note on stand alone testing). The EUT in your setup photos is placed to the far side of the table. This is an improper test setup for part 15B testing.

***R. The test engineer in this case considered the antenna to be the main component of the EUT as it was radiated emissions testing. This issue will be corrected.***

5) FYI only - Please note that the accepted version of ANSI C63.4 is the 2003 version. Please note that you have incorrectly referenced the 2001 version. Please reference correct versions of test methods etc.

***R. Noted. Future reports will reference the correct version of ANSI C63.4.***

6) Please note that, while still compliant to the dwell time restrictions, the calculated dwell time on page 17 of the report appears to be incorrect. You state that the dwell time is 257.6ms; however, the plots indicate that as the pulse appears on the same channel 14 times and as the pulse width in the plot on page 17 shows 19.6ms, the dwell should be 268.1ms (i.e. 14 occurrences times 19.6ms). While this is not a large error, data should be accurate.

***R. It appears that the plot on Page 17 actually shows an on time of 19.15ms as opposed to 19.6ms.***