

ROGERS LABS, INC.

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May 18, 2001

Federal Communications Commission
Equipment Approval Services
P.O. Box 35815
Pittsburgh, PA 15251-3315

Applicant: INTERMEC TECHNOLOGIES CORPORATION
6001 36th Avenue West
Everett, WA 98203-9280
Phone: (505) 856-8054

RE: Response for reference number 19311.

Equipment: FCC ID: HN21555-2450
FCC Rules: Part 2 and 15.247

Gentlemen:

Attached please find our response to your request for information regarding the Intermec Technology submittal application for grant of certification for HN21555-2450, EA100016. A copy of the request is included here for reference.

To: Scot Rogers, Rogers Labs, Inc.
From: Joe Dichoso
jdichoso@fcc.gov
FCC Application Processing Branch

Re: FCC ID HN21555-2450
Applicant: Intermec Corporation
Correspondence Reference Number: 19311
731 Confirmation Number: EA100016

1) Need to have a photo or illustration showing where is the antenna located in this device to determine if the hand SAR is done appropriately.

2) It appears the handle has been taken off from the device in the revised hand SAR photos.

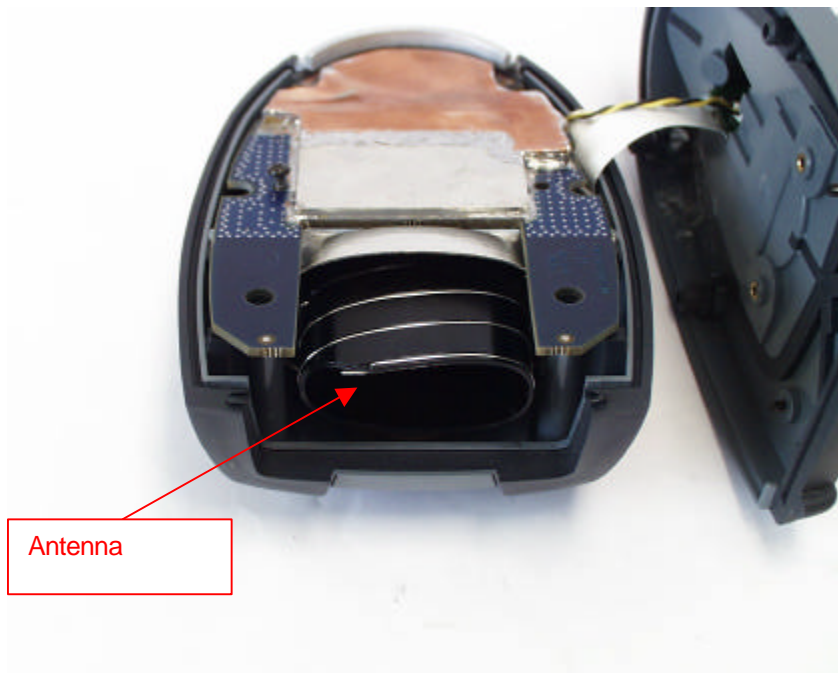
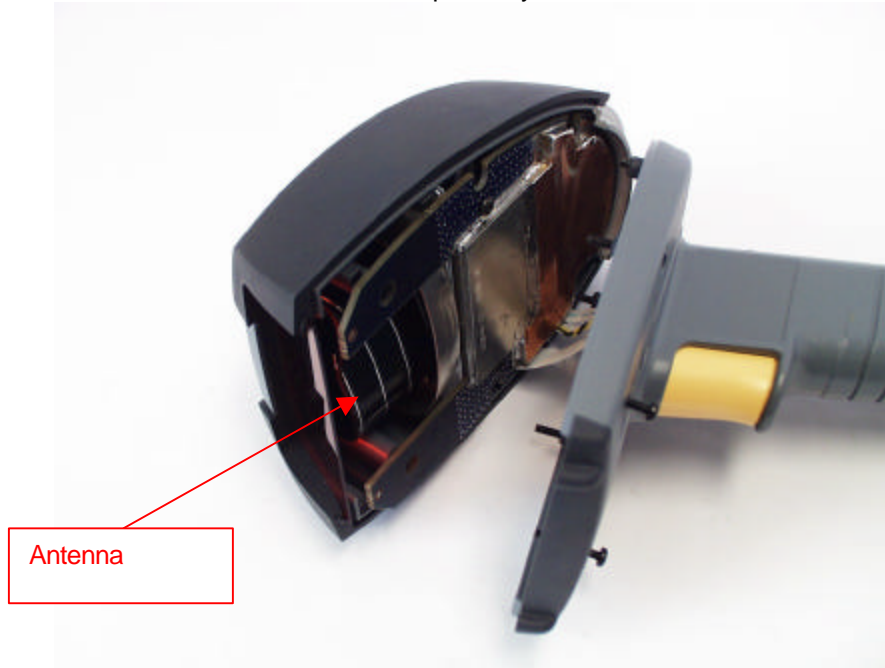
3) There is no peak conducted output measurement in the EMC report. It appears they claim 1.0 W and did EIRP, but provided the SAR lab with some conducted numbers ?

Output is ??? (peak conducted or EIRP). Device is a hand-held, hand-operated RF tag reader and has been tested for SAR compliance in appropriate operating configurations. End-users must be informed of the operating requirements for satisfying RF exposure compliance. The highest reported SAR values are - Hand: 1.82 W/kg; Body: 1.36 W/kg.

FCC Response letter for request number 19311.

RESPONSE

1. Here is a photograph of the unit with the handle removed. Notice the maximum antenna radiation pattern is out the front of the unit. The handle provides an easy to hold location for the user and restricts the proximity of the users hand to the antenna.



2. The handle was removed in the original SAR testing exactly like was done for the 1555-900 unit, which you approved 1/26/2001 refer to the SAR report for FCC ID HN21555-900. This was done to yield the maximum radiation exposure for "touching the surface of the antenna". There are no electronics in the handle which would effect the SAR data.

3. The peak conducted output measurement was reported in the test report on page 24 of 39. As stated there the unit produced 137 dBuV (30 dBm or 1 Watt) maximum. We apologize for the misunderstanding and request you continue with the Grant of Certification.

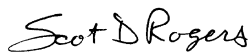
General Comments

The 1555 2450 MHz Hand Held RFID/Barcode Scanner manufactured by Intermec Technologies Corporation is a device for communicating (read/write) with an RFID tag or reading bar code information. This device functions exactly like the 915 MHz Hand Held RFID/Barcode Scanner, FCC ID# HN21555-900. Both of these devices are basically hand held portable versions of existing RFID products. Reference FCC ID# HN2UAPRFID-900 & HN2UAPRFID-24.

Should you require any further information, please contact the undersigned.

Thank you for your consideration in this matter.

Sincerely,



Scot Rogers
Rogers Labs, Inc.
Enclosures