



**Zebra Technologies Corporation**

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Federal Communications Commission  
7435 Oakland Mills Road  
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To Whom It May Concern:

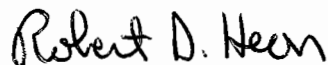
In reference to the application for FCC ID#: I28MD-RW4137 (802.11b compact flash radio module), this device is being submitted for limited MODULAR TRANSMITTER APPROVAL based on the guidelines in FCC Publication DA 00-1407. We believe that this transmitter meets all 8 criterion listed in DA 00-1407 as detailed in the paragraphs below.

Note that I28MD-RW4137 is a radio module that will be used exclusively within products made by Zebra Technologies Corporation.

- 1) I28MD-RW4137 is based on a Symbol Technologies LA-4137-1002-WW compact flash form factor 802.11b radio module. The LA-4137-1002-WW is fully shielded.
- 2) I28MD-RW4137 has buffered inputs on all digital lines. Overdriving one or more of the digital inputs will have no affect on the transmitter output.
- 3) Symbol Technologies LA-4137-1002-WW voltage regulator IC: U105 supplies power to the transmitter. The unit is designed to accept regulated 3.3 volts DC at it's input and provide a regulated 2.85V. Further, since the module will only be used in Zebra products, Zebra has full control of the power supply to the compact flash module and will assure a 3.3 volt supply.
- 4) I28MD-RW4137 will always be used with one of a family of approved antennas, all of which are mounted (with the radio) inside a finished printer or other Zebra product. None of these antennas is user accessible, nor is the antenna cable / connector user accessible; for this reason the antennas can be considered to be permanently attached. All of the antennas in the family have been tested with the radio module as part of the limited modular approval; test results are included with the application. If the radio is to be used with a new antenna, further testing will be performed and a Class II permissive change will be obtained.
- 5) I28MD-RW4137 was tested in a stand-alone configuration, outside of any Zebra printer.

- 6) I28MD-RW4137 will carry a label containing it's FCC ID number. Additionally "Contains FCC ID: I28MD-RW4137" will appear on the external label of the product the radio is mounted it. All products containing this module will have this statement clearly visible. Examples of both the internal and external labels have been provided as part of the application.
- 7) I28MD-RW4137 will only be used with Zebra Technologies products; this includes printers built by Zebra that are branded for other companies. Thus Zebra will maintain full control over the use of the module and can guarantee that all conditions for use will be met in any product that the module is installed in.
- 8) Most of the products that I28MD-RW4137 will be used in are body worn devices subject to Part 2.1093 of the FCC rules. SAR testing has been performed on all product configurations containing this radio and the data submitted as part of this application. Additional SAR testing will be performed on any new product / antenna configuration that will be released in the future as part of the Class II permissive change that releases the new product / antenna.

Sincerely,



Robert D. Heon  
Project Engineer  
Zebra Technologies Corporation