



January 19, 2007

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046-1609

To Whom It May Concern:

In reference to the application for FCC ID#: I28RFID-402931 (13.56 MHz RFID encoder radio module), this device is being submitted for **Limited MODULAR TRANSMITTER APPROVAL** based on the guidelines in FCC Publication DA 00-1407. This transmitter does not meet all 8 criteria listed in DA 00-1407. Where there is a non-conformance, an explanation is provided that allows for a Limited Modular Approval.

Note that I28RFID-402931 is a radio module that will be used exclusively within products made by Zebra Technologies Corporation.

- 1) The RF portion of the module is not shielded. Shielding is provided by the host devices.
- 2) The ASIC (MFRC400) provides buffering on all digital lines. Overdriving one or more of the digital inputs will have no effect on the transmitter output.
- 3) The RFID 402931 accepts a regulated 5 VDC, which is provided by the host devices, to the RFID 402931 module. Further, since the module will only be used in Zebra products, Zebra has full control of the power supply to the RFID 402931 module and will assure a 5 VDC supply.
- 4) I28RFID-402931 module has an integrated antenna. The antenna consists of traces on the PCB. It is not removable.
- 5) I28RFID-402931 was tested in the host devices.
- 6) I28RFID-402931 will carry a label containing its FCC ID number. Additionally "Contains FCC ID: I28RFID-402931" will appear on the external label of the product the radio is mounted in. 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) I28RFID-402931 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) The products that I28RFID-402931 will be used in will be at least 20 cm away from any body part.

Sincerely,

Gus Medina  
Compliance Engineer  
Zebra Technologies Corporation

**Zebra Technologies Corporation**

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