

EXHIBIT 2

**EAGLE™ II TECHNICAL SPECIFICATION  
INCLUDING HUMAN EXPOSURE STATEMENT**

As required by § 2.1033(c)(3), provided with this filing is a copy of the draft version of the “Eagle™ II Technical Manual” which describes the features and operation of the Eagle II 900/1900 MHz GSM Radio Module. Included in this manual is a section entitled “Instructions to the Original Equipment Manufacturer (OEM).” This section provides the OEM with the necessary guidance and information to make certain that the appropriate installation and operating instructions, conditions and restrictions will be made available to the end-user. Ultimately, this documentation is designed to ensure compliance with the maximum permissible exposure (MPE) limits given in § 1.1310 for products incorporating the Eagle II GSM Radio Module in either fixed or mobile applications.

Also provided on page 3 of this exhibit is a statement included in the aforementioned manual addressing human exposure to radiofrequency radiation. This information is necessary to ensure that both OEM equipment developers and end-users of the Eagle II are made aware of the dangers of exposure to radiofrequency radiation and that products containing the Eagle II must be installed and operated in accordance with the instructions provided to ensure compliance with current FCC guidelines addressing exposure to radiofrequency radiation.

Pursuant to § 24.52 RF hazards, all emissions from the Eagle II, both fundamental and unwanted, are subject to the radiofrequency radiation exposure requirements given in § 1.1307(b), § 2.1091 and § 2.1093, as appropriate.

For fixed transmitters, § 1.1307(b) requires the preparation of an Environmental Assessment (EA) if the transmitter would cause human exposure to levels of radiofrequency radiation in excess of the applicable limits given in § 1.1310. However, determination of compliance with these limits and preparation of an EA if they are exceeded is required only for licensed PCS facilities, operations and transmitters with the following characteristics:

1. non-building-mounted antennas: height above ground level to lowest point of antenna < 10m and total power of all channels > 2000 W ERP (3280 W EIRP)
2. building-mounted antennas: total power of all channels > 2000 W (3280 W EIRP)

"Fixed" in this context means that the device is physically secured at one location and is not able to be easily moved to another location. Since the Eagle II transmits on a single channel with a maximum peak output power of 1.0 W (30 dBm) nominal, the maximum specified antenna gain of 7 dBi results in a maximum peak e.i.r.p. of 37 dBm (5.0 W), well below the level which would trigger a routine environmental evaluation. Therefore, in fixed applications, the Eagle II is categorically excluded from performance of a routine environmental evaluation or preparation of an EA.

In § 2.1091(b), a mobile device is defined as a transmitting device designed to be used in other than fixed locations and to generally be used in such a way that a separation distance of at least 20 centimeters is normally maintained between the transmitter's antenna and the body of the user or nearby persons. In accordance with § 2.1091(c), mobile PCS devices are categorically excluded from routine environmental evaluation for RF exposure prior to equipment authorization or use if their e.i.r.p. is less than 3 W (34.8 dBm).

The Eagle II technical specification mandates a separation distance of at least 20 cm between the unit's antenna and the body of the user and nearby persons for ALL uses and applications, both mobile and fixed. As stated in § 24.232(b), peak e.i.r.p. is limited to 2 W (33 dBm) for mobile applications, and the Eagle II technical specification limits maximum antenna gain in this application to 3 dBi. Therefore, for mobile applications, the Eagle II is categorically excluded from a routine environmental evaluation for RF exposure.

Finally, the Eagle II is not designed for or intended to be used in portable applications, as defined in § 2.1093 (within 20 cm of the body of the user), and the technical specifications and OEM instructions contains specific language prohibiting such uses.

In summary, therefore, the Eagle II is categorically excluded from performance from a routine environmental evaluation and preparation of an EA when installed, operated and used in accordance with the documentation and guidance provided to the OEM and the final user. Compliance with both the 2 W (33 dBm) e.i.r.p. and MPE limits is realized by limiting antenna gain to 3 dBi for mobile and 7 dBi for fixed applications, in conjunction with the required 20 cm separation distance (which precludes portable applications). Power density for the worst case condition of a 7 dBi gain antenna at a 20 cm separation distance is approximately  $1.0 \text{ mW/cm}^2$  (see OET Bulletin 65, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields"). Due to the nature of the GSM frame structure, the 1/8 transmitter duty cycle results in an average power density of approximately  $0.125 \text{ mW/cm}^2$ . OET Bulletin 65 permits this "source based" averaging ("'source based' time-averaging based on an inherent property or duty cycle of a device is allowed.") This average power density, with maximum permitted antenna gain, is 9 dB lower than the allowed MPE of  $1.0 \text{ mW/cm}^2$  for the general population/uncontrolled exposure. Use of lower gain antennas will result in correspondingly larger safety margins.

In all applications and uses, compliance with current FCC RF regulations limiting human exposure to radiofrequency exposure is dependent upon installation, operation and use of the Eagle II 900/1900 MHz GSM Radio Module in accordance with all instructions provided.

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## HUMAN EXPOSURE COMPLIANCE STATEMENT

The following statement addressing human exposure to the radiofrequency radiation emitted by the Eagle II 900/1900 MHz GSM Radio Module is included in the "Eagle™ Technical Specification."

Xircom, Inc. Wireless Technology Group certifies that the Eagle™ II 900/1900 MHz GSM Radio Module (FCC ID: J3OEAG2919) complies with the RF hazard requirements applicable to broadband PCS equipment operating under the authority of 47 CFR Part 24, Subpart E of the FCC Rules and Regulations. This certification is contingent upon installation, operation and use of the Eagle II and its host product in accordance with all instructions provided to both the OEM and end-user. When installed and operated in a manner consistent with the instructions provided, the Eagle II meets the maximum permissible exposure (MPE) limits for general population / uncontrolled exposure as defined in Section 1.1310 of the FCC Rules and Regulations