



August 29, 2003

FEDERAL COMMUNICATIONS COMMISSION

7435 Oakland Mills Road
Columbia, MD 21046
USA

Subject: Type Acceptance Application under FCC 47 CFR, Parts 2 and 90 (Subpart I) - Non-Broadcast Radio Transceivers Operating in the frequency bands 806 - 821 MHz (25 kHz Channel Spacing) and 821-824 MHz (12.5 kHz Channel Spacing).

Applicant: Keycorp Limited
Product: Mobile Payment Terminal
Model: LP9100 / K78-204
FCC ID: P3A-K78-YYY



Dear Sir/Madam,

As appointed agent for Keycorp Limited, we would like to submit the application for certification of the above product. Please review all necessary files uploaded to FCC OET Laboratory Division Electronic Filing Site.

The Keycorp Limited Mobile Payment Terminal, Model LP9100 / K78-204 employs a Wavenet Technology Wireless OEM Modem Module certified by FCC (FCC ID: PQS-BM28001, on Dec. 2, 2002). Since, there is no change on the radio module's operation with exception to the duty cycle (from 10% to 30%), only the following tests are performed to ensure the continuing compliance with different enclosure and power supply conditions:

- (1) RF output power: to ensure the maximum power still meets the FCC Grant FCC ID: PQS-BM28001 so that the test results from this application can be used for the new application FCC ID: P3A-K78YYY.
- (2) Transmitter spurious/harmonic radiated emissions. These tests are performed to ensure that the new enclosure and packaging will not affect radiated emissions from the OEM radio transmitter module.
- (3) RF exposure evaluation for portable application (SAR).
- (4) 99% occupied bandwidth and emission masks

If you have any queries, please do not hesitate to contact us by our TOLL FREE number:

OUR TELEPHONE NO.: 1-877-765-4173

Yours truly,

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