



January 29, 2002

FEDERAL COMMUNICATIONS COMMISSION
7435 Oakland Mills Road
Columbia, MD 21046
USA

Subject: Class II Permissive Changes under FCC 47 CFR, Parts 2 and 90 (Subpart I) - Licensed Non-Broadcast Radio Transceivers Operating in the frequency bands 806-821 MHz (25 kHz Channel Spacing).

Applicant: KEYCORP LIMITED
Product: MOBILE PAYMENT TERMINAL
Models: K78-200 & K78-204/LP9100
FCC ID: P3AK78-2XX

Dear Sir/Madam,

As appointed agent for **KEYCORP LIMITED**, we would like to submit the application to Federal Communications Commission for certification of the above product for Class II Permissive Changes.

The modem unit of K78-204/LP9100 has been modified since previous testing as follows:

- (a) Ground plane modified
- (b) Antenna connector changed to gold connector
- (c) Ferrite placed on battery supply rail

UltraTech Engineering Labs Inc. will provide the following test data for compliance with Class II Permissive Changes:

- ERP Measurements
- Transmitter Spurious/Harmonic emission measurements
- SAR Measurements

Please review all necessary files uploaded to the FCC OET site.

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,

Tri Minh Luu, P. Eng.,
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TML/DH

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