

NORTHWEST EMC, INC.

22975 NW Evergreen Parkway, Suite 400
Hillsboro, OR 97124

February 11, 2005

Dear Application Examiner:

On behalf of Intermec Technologies Corporation, Northwest EMC, Inc is submitting this application for the original certification of Intermec's PB42 printer, FCC ID: HN2-PB42. The PB42 contains Mitsumi's Bluetooth radio module, Model WML-C30XX, which is identical to the radio described in the original application for FCC ID: POOWML-C30XX.

The Intermec PB42 printer will be located within 20cm of Intermec's CK60 handheld terminal. The CK60 contains FCC ID: HN2-BTM311. The attached letter from Terry Mahn and Bob Ungar of Fish and Richardson explains why the radios cannot transmit simultaneous. Therefore the radios are not co-located and are eligible for TCB approval.

The radio utilizes a single integral antenna. This configuration satisfies the requirements of 47 CFR 15.203.

The test reports and exhibits demonstrate compliance with FCC rules 47 CFR 15.247 as a portable, Part 15 Spread Spectrum Transmitter. The 7 Layers test report demonstrates compliance of the PB42's radio module with the antenna port conducted requirements. The Northwest EMC test report demonstrates compliance of the PB42 printer with the AC power line conducted emissions, and the radiated spurious emissions requirements. The SAR report demonstrates compliance of the PB42 printer with the RF Exposure requirements. The PB42 printer has been verified as a digital device.

Your efforts in reviewing this application are greatly appreciated.

Best regards,

Northwest EMC, Inc.

FISH & RICHARDSON P.C.

1425 K STREET, N.W.
11TH FLOOR
WASHINGTON, DC 20005

Frederick P. Fish
1855-1930

W.K. Richardson
1859-1951

February 4, 2005

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Dear Greg:



AUSTIN
BOSTON
DALLAS
DELAWARE
NEW YORK
SAN DIEGO
SILICON VALLEY
TWIN CITIES
WASHINGTON, DC

On the recommendation of Northwest EMC, we have conducted a review of the applications for FCC ID HN2-PB42 ("printer"), and FCC ID HN2-BTM311 ("scanner"), filed on January 25, 2005 and January 26, 2005, respectively, on behalf of Intermec Technologies Corporation. Both the scanner and printer are equipped with Bluetooth transceivers. The applications were filed with the FCC because review of SAR testing is required by the FCC when radio modules are designed to operate on a co-located basis—simultaneously transmitting within 20 cm of one another. The scanner and printer will, at least in one configuration, be sold as a pair, together with a shoulder bag carrier and, it was presumed, both will transmit at the same time.

The scanner application was for a Class II permissive change in order to permit co-location with the printer. The printer application was for certification because the installed Mitsumi Bluetooth module (FCC ID POOWMLC30XX) had not been certificated for co-located use or for operation within 2.5 cm of a person's body.

After review of the applications and detailed discussions with Intermec engineers Katie Molina and Bruce Morton, we have now determined that, in fact, the scanner and printer are not designed to, and, in fact, do not, transmit simultaneously. It is our understanding that the scanner, of course, must be removed from the shoulder bag to be used. The printer may or may not remain in the shoulder bag. Upon scanning a bar code, the scanner is then directed to initiate a "session" with the printer. The two devices then exchange recognition signals to identify one another. The scanner then transmits data to the printer. During the download of data the scanner and printer maintain acknowledgement of one another through a handshake protocol after each packet of information is transmitted. Essentially, the scanner transmits and then the printer answers. They transmit sequentially, not simultaneously, even in the unusual situation where the scanner may still be downloading data when it is returned to the shoulder bag.

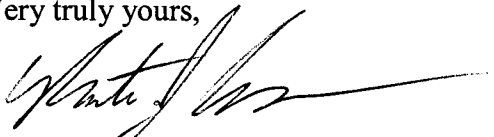
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February 4, 2005
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Thus, while it is likely that the printer will be transmitting while in the shoulder bag (thus necessitating certification for operation within 2.5 cm of the body), the scanner (which has already been certified for operation within 2.5 cm of the body), even if placed in the shoulder bag, does not transmit simultaneously with the printer. Thus, it appears that the scanner and printer will not be "co-located," as that term is used by the FCC. Under these circumstances, although the printer will still require certification in order to permit its use within 2.5 cm of a body, it does not require certification for co-located operation and therefore its certification may be granted by a TCB. Since the scanner has already been certificated for use within 2.5 cm of a body and does not require grant of a Class II permissive change for co-located operation, it requires no further application.

Under these circumstances, FCC action on the applications is neither necessary nor warranted. We recommend, therefore, that NWEMC 1) requests dismissal of applications for FCC ID HN2-BTM311 and FCC ID HN2-PB42, and 2) prepares the certification request for FCC ID HN2-PB42 for transmittal to a TCB for action.

Please call us if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Terry G. Mahn", with a long horizontal flourish extending to the right.

Terry G. Mahn
Robert J. Ungar