

A **UNOVA** Company

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October 19, 1999

Intermec Technologies Corporation declares the compliance of our Model 2100 with 900 MHz RFID module (FCC ID: HN2UAPRFID-900) with RF exposure requirements of FCC rules as specified by Part 15.247 b(4) and OET Guide 65 under following conditions:

While spread spectrum devices are categorically exempt from SAR testing per the above mentioned rules, the relatively high power level of this device makes us take precautions to ensure user safety. As can be seen in the test report the maximum transmitted peak power is less than 600 mW as measured per FCC guidelines. The antenna gain is approximately 6 dB, making the total transmitted power ~ 33.8 dBm.

The installations of this device will be in industrial environments, where the likelihood of non-users or naïve users being by the antennas during the operation is extremely low. In a similar application, our Model 2100 with a 2.4 GHz OpenAir FHSS module (manufactured by Proxim Inc.) under FCC ID: HN221XX-24 was approved with the condition that User Documentation accompanying the product have a warning statement, cautioning the user to be at least 10 cm (4 inches) away from the antenna, when the device is in use. That module had ~ 500 mW output power with an antenna system using a maximum antenna gain of 9 dB. Since the total EIRP of this product is less than the previously approved version as well as the frequency is lower in the 900 MHz band, we would like to comply with OET 65 requirements by maintaining the same warning statement in the user documentation as shown in the attached exhibit.

Please feel free to contact us, if you have any questions regarding these issues. Sincerely,

Kursat Eroglu, MSÉE Sr. EMC Engineer