



## Network Systems Organization

Federal Communications Commission  
Equipment Approval Services  
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**Re: Certification request for the Symbol model LA-4121 Wireless LAN PCMCIA card**

**FCC ID: H9PLA4121**

Date: May 7, 2000

To The Commission:

This certification request is for the Spectrum 24 model LA-4121 WLAN Module. The LA-4121 is a 2.4 GHz direct sequence IEEE 802.11 compliant radio incorporated into a PC Card package. This request is for certification of a Part 15 transmitting device operating under 15.247(c) and its associated antennas.

Symbol Technologies, Inc. manufactures information systems that are employed in commercial establishment to assist in controlling inventory. Spectrum 24 is a Wireless Local Area Network (WLAN) used along with hand held computers to assist in information collection typically in retail stores, warehouses, and factories.

The following files are electronically submitted as attachments.

Exhibit Type	File Name	Confidential
Block Diagram -----	LA4121 Blk Dia.pdf	X
Cover Letters: -----	LA4121 Cover Letter.pdf	
Attestation Statements -----	LA4121 DOC.pdf	
External Pictures -----	LA4121 Ext Pics.pdf	
Internal Pictures -----	LA4121 Int Pics.pdf	
ID Label/Location Info -----	LA4121 Label.pdf	
Operational Description -----	LA4121 OpDesc.pdf	X
RF Exposure Info Part 1 -----	LA4121 RF Exposure 1-10.pdf	
RF Exposure Info Part 2 -----	LA4121 RF Exposure 11-20.pdf	
RF Exposure Info Part 3 -----	LA4121 RF Exposure 21-30.pdf	
RF Exposure Info Part 4 -----	LA4121 RF Exposure 31-35.pdf	
Schematics -----	LA4121 Schem.pdf	X
Test Report Photos -----	LA4121 Test Report Photos.pdf	
Test Report Plots -----	LA4121 Test Report Plots.pdf	
Test Report -----	LA4121 Test Report.pdf	
User Manual -----	LA4121 User Man.pdf	

Note that the RF Exposure contains all of the antenna information. Because of its size it is broken up into four parts. All four parts are cross book marked. If they are all in the same directory the bookmarks will work. There are 35 antennas included in this submission. Rather than test all of them for restricted band emissions fourteen of them were chosen as the highest gain of their antenna type. The other untested antennas reference the antenna of the same type that was tested.

Symbol Technologies, Inc. ("Symbol"), requests that the Block Diagram, Schematics, and Operational Description Exhibits of the above referenced application be withheld from routine availability for public inspection pursuant to Section 0.459 of the Commissions Rules and Freedom of Information Act ("FOIA") Exemption 4, 5 U.S.C. 552(b)(4).

These exhibits consist of "trade secrets [or] commercial or financial information obtained from a person and privileged or confidential", 5 U.S.C. 552(b)(4), and is therefore entitled to protection from disclosure under FOIA.

The documents in question contain trade secrets: detailed technical descriptions, specifications and schematics for a product to be offered for sale. These materials provide particulars on the product design that can be ascertained from inspection of the product itself only with extraordinary expenditures of time and effort, if at all. This information would give Symbol's would-be competitors an unearned and unwarranted competitive advantage.

Moreover, the documents contain "commercial information" within the scope of FOIA Exemption 4. This information is the product of Symbol's investment of money, personnel, and other resources. The result of that investment is a fairly earned position in the marketplace. Premature release of the information threatens substantial and unwarranted harm to Symbol's competitive position.

For these reasons, Symbol has taken pains to keep this technical information confidential, and intends to continue doing so. Symbol customarily withholds this information from persons outside the employ of Symbol and certain of its suppliers and contractors, and even within these groups routinely limits access to persons having a particular need for the information. If the Commission were to make these documents public, it would be giving away hard won fruits of Symbol's labors without compensation.

The filing fee required for this request is submitted by credit card account as entered on Form 159 mailed under separate cover.

If there are any questions about this request, please call me at the number above.

Thank you for your attention.

Respectfully submitted,

Norman H. Nelson