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October 10, 2006

Mr. Dennis Ward
American Telecommunications Certification Body Inc.
6731 Whittier Ave
McLean, VA 22101

RE: Comments of September 27, 2006
APPLICATION: H9PMR400 Symbol Technologies, Inc.

Dear Mr. Ward:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

Gregory M. Snyder
Chief EMC Engineer, Wireless/Telco Services Manager

Brian J. Dettling
Documentation Specialist

WLL Project: 9284

1) Please note that the rf exposure calculations were performed assuming a frequency of 902.75MHz, a power level of 28.45dBm and a gain of 6dBi. However, the test report states that the power measured at 902.75MHz is 29.75dBm and not 28.45dBm. This means that at 902.75MHz the rf exposure calculation at that frequency and power setting would be 22.16cm. The manual states a minimum 23cm separation is needed. Please correct the MPE report to reflect actual power and frequencies used (i.e. please use the minimum 23cm mentioned in the manual).

R. The output power reported in the MPE document is 29.75dBm but is then reduced to 28.45dBm based on operational duty cycle. This level was then used for calculating the Power Density at 20cm.

2) Please note that page 8 and 17 of the test report states the frequency range of the device is 902.75M – 927.25MHz. Please note that the test data on page 14 of the report states the high frequency is 907.75MHz. Please explain and please correct as necessary.

R. The table has been corrected to show the correct frequency of 927.25MHz. Please see "MR400 Test Report – revised".

3) FYI – please note that the data tables should clearly identify average vs peak readings. While the limits for average and peak are listed and while the procedure section states that peak and average data is listed, the data table does not declare or clearly indicate what data is for which limit. Please consider clearly identifying average data and peak data.

R. Noted. The revised report has been updated to indicate the peak and average measurements.

4) Please note that the non modification statement on page 41 of the manual says, "Any changes or modifications not expressly approved by <OEM>, could void the user's authority to operate the equipment." Please note that this does not appear to meet the requirements of 15.21 as the term <OEM> is not clarified nor identified to be the grantee or party responsible for compliance. Please also note that page 36 of the manual repeats the statement but uses Symbol in place of the <OEM>. Please explain and please correct as necessary.

R. The requirements have been addressed in the corrected manual. Please see "MR400 User Manual – revised".

5) Please note that the test report states that the type antenna used during testing is a 6dBi "Panel" antenna. Please note that page 38 of the manual states that the approved antenna is a "Circular polarized" antenna (model AN480). Please note that "panel" type antennae, unless specifically designed with antenna array segments in both horizontal and vertical polarization, are not necessarily considered to have a circular polarization (i.e. radiating both horizontal and vertical polarized patterns). Please explain the relationship between the panel type antenna listed in the report and the circular polarized antenna specified in the manual.

R. The antenna was inadvertently referred to as a "panel". That designation has been removed from the revised report. Additionally, the connector type has been corrected.

6) Please note that page 40 of the manual clearly states that the device is approved for "mobile" only configurations. Please note that the manual on pages 41 states handheld use and then page 40 states that use is restricted to mobile only. Please explain and please justify how this device with the antenna specified (circular polarized) can be used in a hand held operation and please include information on how the 23 cm separation is met under a condition of hand held operation.

R. – 1) The Antenna used was a Reference Antenna for test purposes. 2) See page B-4 of the User Manual for clear information on Final Product Compliance.

7) Please provide the list of hopping frequencies and how they are pseudo-random.

R. Please see "MR400 Operational Description - Freq Hop".