

September 30, 1998

Intermec Technologies Corporation declares the compliance of our product Model RM181 with the following specific sections of FCC rules under the explained conditions:

- **Antenna System and Part 15.203 Compliance**

Model RM181 is fitted with a MMCX connector. This connector is available only in bulk quantities to manufacturers and not available to consumers through catalog or retail sales. In addition to the standard dipole and tab antennas provided by Proxim Inc., which connect directly to the transceiver, Intermec Technologies uses four other antennas in different hosts. These antennas are fitted with their own custom design connectors such as reverse gender, dimension-modified TNC etc. These antennas connect to the transceiver through an adapter cable inside the host product. Since the users do not have access to either connector, they cannot use their own standard antennas with this product.

- **Class A Justification (Parts 15.107, 15.109)**

Intermec serves industrial customers such as warehouses, factories, storage facilities etc.. Since all the host products this transceiver will be integrated to will be used in these environments and since it will not be offered as a module for retail sale, it qualifies under Part 15 Class A for digital emissions.

- **OET Bulletin 65 on RF Exposure Compliance**

Spread Spectrum devices are categorically excluded from SAR testing per Supplement C (Edition 97-01) to OET Bulletin 65 (Edition 97-01) section 3 (page 22). However, there are restrictions in forms of user warnings and even testing requirements depending on output power levels. In our conversations with Mr. Kwok of the FCC Authorization and Evaluation Laboratories in the recent months, we came to the understanding that for products similar to this one where the transmit power is under 100 mW and antenna gain does not exceed 6 dB, a warning statement in the manual supplement cautioning the user

not to touch the antenna during operation would be adequate. We have other requirements for other products with higher output powers, but the statement in the attached document was found adequate by him.

- **Part 2.1043 Continued Compliance**

Intermec Technologies Corp. through its ISO 9001 certified quality system and product management procedures, guarantees all changes to the tested product will be inspected by EMC engineering and that the approval of FCC will be sought for any changes that could potentially affect the emission characteristics of the product.

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

Sincerely,

Kursat Eroglu, ESEE
Sr. EMC Engineer

