



Network Systems Organization

Federal Communications Commission
Equipment Approval Services
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Re: Certification request for the Symbol model DM4046 WLAN DS Radio Module

Date: December 18, 2000

To The Commission:

This certification request is for the Spectrum 24® model DM4046 **WLAN DS Radio Module**. The DM4046 is a 2.4 GHz direct sequence IEEE 802.11 compliant transceiver. The DM4046 is configured in a form factor for installation into two different models of Voice Over IP wireless phones. This request is for Limited Modular Approval of a Part 15 transmitting device operating under 15.247(c) and its associated antennas.

Symbol is requesting a Limited Modular Approval for this device. This device meets seven of the eight requirements for modular approval. This device does not meet requirement #3 for onboard voltage regulation. This device will only be installed into end products with the necessary voltage regulation to ensure that the end product remains compliant.

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 -----	DM4046 Blk Dia.pdf	X
Cover Letters: -----	DM4046 Cover Letter.pdf	
Attestation Statements -----	DM4046 DOC.pdf	
External Pictures -----	DM4046 Ext Pics.pdf	
Internal Pictures -----	DM4046 Int Pics.pdf	
ID Label/Location Info -----	DM4046 Label.pdf	
Operational Description -----	DM4046 OpDesc.pdf	X
RF Exposure -----	DM4046 RF Exposure.pdf	
Schematics -----	DM4046 Schem.pdf	X
Test Report Photos -----	DM4046 Test Report Photos.pdf	
Test Report Plots -----	DM4046 Test Report Plots.pdf	
Test Report -----	DM4046 Test Report.pdf	
User Manual -----	DP4046 User Man.pdf	

Note that the RF Exposure contains all of the antenna information. There are 3 antennas included in this submission. The radio board is used in two wireless voice communication devices. One of them uses one antenna and the other uses the remaining two antennas.

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,

A handwritten signature in black ink, appearing to read "Norm H Nelson", written in a cursive style.

Norman H. Nelson