

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

July 16, 2005

RE: Zebra Technologies

FCC ID: I28MD-ZLAN11B

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

1.) Kindly refer to page 29 of the Manual. Please “fill in the blanks” with regard to RF Exposure conditions.

Response: Please refer to the revised manual uploaded with this response.

2.) Please refer to your Modular Request letter. This device is restricted to Zebra Technologies products – which is good. But we need to be a little more specific. May I suggest specifying a chassis or model number sequence? This is to insure that when additional products are created by the Applicant with differing locations for the transmitter and/or antenna, it is understood that additional SAR testing may be required.

Response: Please refer to the revised Modular Request letters uploaded with this response.

3.) What labeling will be placed on the outside of this device when this RF card is installed? We will need both the FCC ID and 15.19 statements.

Response: Please refer to the revised label exhibit uploaded for samples of the external labels.

4.) Please be sure that 15.21 statements appear in the Manual. If I have missed it, my apologies - please indicate where I can find this required information.

Response: Please see the 15.21 statement approximately halfway down page 5, titled “Proprietary Information”; it appears as the last sentence in the “FCC Compliance Statement” section.

5.) I am confused – you have an RF Exposure statement that indicates SAR has been performed on page 29 of the Manual, but you also have an RF Exposure statement that indicates the power and antenna placement meet the requirements of the TCB Exclusion List. This means you find no need for SAR testing. If SAR testing has been performed as part of the Certification process, then these SAR values must appear in the Manual [pp.29]. But if the TCB Exclusion List of 48mW at 2.5cm is used, I will need additional justification [photos, measurements, etc.] proving the antenna is indeed 2.5cm or greater from the end user.

Response: Please refer to the revised user manual uploaded with this response.

6.) Please provide a little bit more of the reasoning for your unusual Test Setup. Why was the PCB antenna(s) [seen in the Photographs] not tested in free-space? Why was it tested inside another printer?

Response: As this is a limited modular approval, and the module will always be embedded in Zebra printers, we hold that the antennas tested inside of a typical housing represent the most accurate test method and captures any influence the enclosure might have on the RF characteristics.

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination.

Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.