The following section needs added to the report to support modular approval as required by the Public Notice attached for your reference. In the letter I will supply I will request "Modular Approval". df

Transmitter modular approval, conditional requirements.

- 1) The ABTM3 radio module has its own shielding and is tested herein extended outside of an Intermec 700 terminal. The shield is added during manufacturing and is not easily removed. Instructions to end-users will warn of possible regulatory consequences for modifying the radio in any manner.
- 2) As a radio module designed specifically for data transfer, only data and power is presented to the radio, all modulation and control of the transmitter is contained within the module.
- 3) This radio module does not contain an on-board voltage regulator. The transmitter is specified to operate across a voltage range of +3.3V +/- 0.2volt. Within the test report we show the operation of the transmitter across a voltage range of +2.9 to +3.6 volts. Testing shows the power output and operating frequency is maintained within the parameters defined in the regulations. The 3.3-volt source is a standard supply voltage in many "state of the art" mobile computers and portable printers. Products that do not have the industry standard 3.3 volts to operate the radio will have to incorporate a regulator to operate the radio within the +3.3v +/-0.2 volt range. All Intermec products have either a highly regulated supply sourced from the AC powerline or rechargeable batteries. For battery operated units there is a low battery cut-off to insure stable operation of the computer and memory. When low battery is detected all function ceases at a voltage that insures the processing and storage of data is not corrupted. The low battery detect also serves to maintain the operating voltage of the radio within the parameter specified above. Resellers for the radio will be instructed to maintain the voltage tolerances listed herein.
- 4) The radio uses an on-board antenna. The provisions to address a connector that meets the unique coupler requirements does not apply.
- 5) The radio is tested here-in on an extended flexible PC cable similar to those used within the Intermec 700. The radio is extended four inches (10-cm) beyond the host computer. The extender allows the radio to be placed horizontal and vertical for a complete evaluation of the radiated characteristics of the shielding on the radio. AC power to the Intermec 700 operated the unit during testing. AC line conducted emissions are presented utilizing the same 700 operating from the Intermec charger for the unit.
- 6) As small module the radio not always accessible to the end user once the radio is integrated within a product. Products that restrict access to the radio will have an external label that is visible to users. The label will state "FCC ID: EHAABTM3". Currently Intermec must install the radio during manufacturing. If and when the radio can be installed as a service retrofit the service instructions will include labeling requirements for the exterior of the final product that addresses visibility of the FCC ID. The ABTM3 radio is not an option that the end user can install. The radio will be offered as an OEM radio to selected customer. Those Resellers will also be instructed to label the exterior of products where access to the PC card is restricted.

- 7) The radio module as manufactured is completely controlled by the onboard processor. There are no influences to the operation of the transmitter the end user can induce that will operate the radio outside of scope of the regulations. The radio comes preprogrammed from ALPS. ALPS, Intermec service and manufacturing are the only persons with the equipment to alter the internal radio software that controls transmitter power, operating frequencies, hop sequences and duty cycle. All internal radio software that Intermec installs is placed under revision control within Intermec with restrictions under the supervision of Intermec Safety and Compliance manager.
- 8) The transmitter herein was tested with the antenna that is integrated on the radio module. Compliance to RF exposure requirements for this antenna is included within this application for approval. Appropriate warning statement will be placed with each end product user information based on the results of the RF exposure data filed with this application.