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Client: Zebra Technologies
Model Name/ #: ZBR-2/CC16735-1
FCC ID: I28MD-BTC2TY
FCC: 15.247
IC: RSS-210

APPENDIX A: MODULAR APPROVAL JUSTIFICATION STATEMENT

Please see the following page for a letter from the client.



Zebra Technologies Corporation

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5/08/2003

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046-1609

To Whom It May Concern:

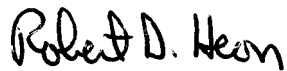
In reference to the application for FCC ID#: I28MD-BTC2TY (Zebra p/n CC16735-1), this device is being submitted for MODULAR TRANSMITTER APPROVAL based on the guidelines in FCC Publication DA 00-1407. We believe that this transmitter meets all 8 criterion listed in DA 00-1407 as detailed in the paragraphs below.

Note that I28MD-BTC2TY is a radio module made by Zebra Technologies and designed for use in Zebra Technologies portable printers and other Zebra products. This device has a proprietary interface that is only found on Zebra Technologies printers.

- 1) I28MD-BTC2TY is based on a Taiyo-Yuden EYSF2SAJJ self-contained Bluetooth radio module. The RF portion of EYSF2SAJJ is fully shielded.
- 2) I28MD-BTC2TY has buffered inputs on all digital lines. Further, the embedded EYSF2SAJJ radio module also has fully buffered inputs. Overdriving one or more of the digital inputs will have no affect on the transmitter output.
- 3) I28MD-BTC2TY contains a voltage regulator that powers the EYSF2SAJJ module, and the EYSF2SAJJ has further, internal, regulation. The unit is designed to accept regulated 5 volts DC at it's input, but transmitter output will not be affected if input voltage is exceeded.
- 4) I28MD-BTC2TY will always be used with one of a family of approved antennas, all of which are mounted (with the radio) inside a finished printer or other product. None of these antennas is user accessible, nor is the antenna cable / connector user accessible; for this reason the antennas can be considered to be permanently attached. All of the antennas in the family have been tested with the radio module as part of the modular approval; test results are included with the application. If the radio is to be used with a new antenna, further testing will be performed and a Class II permissive change will be obtained.
- 5) I28MD-BTC2TY was tested in a stand-alone configuration, outside of any Zebra printer.

- 6) I28MD-BTC2TY will carry a label containing it's FCC ID number; this label will not be visible on the outside of any product that it will be mounted in. The artwork for this label has been provided as part of the application. To compensate for the invisibility of the module label from the exterior of the product, all products containing this label will have the statement "Contains FCC ID: I28MD-BTC2TY" clearly visible on an external label. Examples of these external labels have been provided as part of the application.
- 7) I28MD-BTC2TY will only be used with Zebra Technologies printers; this includes printers built by Zebra that are branded for other companies. Thus Zebra will maintain full control over the use of the module and can guarantee that all conditions for use will be met in any product that the module is installed in.
- 8) Most of the products that I28MD-BTC2TY will be used in are body worn devices subject to Part 2.1093 of the FCC rules. However, the output power from this radio module (typically 0 dBm conducted) is so small that it will easily meet all RF exposure requirements and does not require SAR testing.

Sincerely,

A handwritten signature in black ink that reads "Robert D. Heon". The signature is written in a cursive, slightly stylized font.

Robert D. Heon
Project Engineer
Zebra Technologies Corporation