

NORTHWEST EMC, INC.

22975 NW Evergreen Parkway, Suite 400
Hillsboro, OR 97124

February 23, 2004

Dear Application Examiner:

On behalf of Intermec Corporation, Northwest EMC Inc is submitting this application for the Class II Permissive Change of Intermec's GPRS radio module, FCC ID: EHA700C-SMC45-1. Approval is sought for use with another co-located radio. Please reference the attached email from the FCC that approves the TCB eligibility for processing this type of application.

The GPRS radio module is installed inside Intermec's handheld computer, Model 700C. The 700C also contains two other co-located radio modules (802.11(b) and Bluetooth). The GPRS radio module has been previously certified (FCC ID: EHA700C-SMC45-1) for co-located, portable use with these two other radios (FCC ID: HN22011B and FCC ID: HN2ABTM3-2).

This Class II application demonstrates compliance with FCC requirements while the GPRS radio module is co-located with another previously certified RFID radio (FCC ID: EHARFID915PCC-6). This new RFID radio is internal to a pistol grip (Intermec Model IP3). The IP3 is an optional accessory that attaches externally to the bottom of the 700C. In this configuration, the 700C cannot be used in any body-worn configurations (holsters, belt clips, lanyards, etc).

Since the IP3 uses the same IRDA interface port as the Bluetooth radio, the Bluetooth and RFID radios cannot transmit simultaneously (see Intermec's attestation letter). All other radios can transmit simultaneously. Each radio transmits through its own antenna.

The technical report and RF Exposure exhibits are supplied in support of the co-location condition described above

The technical reports and exhibits demonstrate compliance with FCC rules 47 CFR 15.247 and 47 CFR 24.238.

Your efforts in reviewing this application are greatly appreciated.

Best regards,

A handwritten signature in blue ink, appearing to read "G. Kiemel", with a stylized flourish at the end.

Greg Kiemel, Director of Engineering
Northwest EMC, Inc.

Return-Path: <Tim.Harrington@fcc.gov>
Received: from gatekeeper2.fcc.gov (gatekeeper2.fcc.gov [192.104.54.4])
by nwemc.nwemc.com (8.10.2/8.10.2) with ESMTP id hBINEJE19974;
Thu, 18 Dec 2003 15:40:20 -0800
Received: by gatekeeper2.fcc.gov; id SAA02464; Thu, 18 Dec 2003 18:40:13 -0500 (EST) Received: from unknown(165.135.234.4) by
gatekeeper2.fcc.gov via smap (V5.5)
id xmaa02420; Thu, 18 Dec 03 18:40:12 -0500 Received: from P2PXC01.fccnet.win.fcc.gov (p2pxcs01.fccnet.win.fcc.gov [165.135.240.60])
by smarthost2.fcc.gov with ESMTP; Thu, 18 Dec 2003 18:40:13 -0500 Received: from P2PXB03.fccnet.win.fcc.gov ([165.135.240.48]) by
P2PXC01.fccnet.win.fcc.gov with Microsoft SMTPSVC(5.0.2195.6713);
Thu, 18 Dec 2003 18:40:12 -0500
X-MimeOLE: Produced By Microsoft Exchange V6.0.6487.1 content-class: urn:content-classes:message MIME-Version: 1.0
Content-Type: text/plain;
charset="us-ascii"
Subject: RE: Intermec 700C questions
Date: Thu, 18 Dec 2003 18:40:12 -0500
Message-Id: <8C0103F2896CF143AA78F20B29FF281FCEB7F6@p2pxmb03.fccnet.win.fcc.gov> Thread-Topic: Intermec 700C questions
Thread-Index: AcOzqGGPyKcO/wksQtyG2LJgg8UHQSFwF0w From: "Tim Harrington" <Tim.Harrington@fcc.gov> To: "Greg Kiemel"
<gkiemel@nwemc.com>;
"Tim Harrington" <Tim.Harrington@fcc.gov> Cc: <dghizzzone@nwemc.com>, <kvalleen@nwemc.com> X-OriginalArrivalTime: 18 Dec 2003
23:40:12.0094 (UTC) FILETIME=[47872DE0:01C3C5C0] Content-Transfer-Encoding: 8bit
X-MIME-Autoconverted: from quoted-printable to 8bit by nwemc.nwemc.com id hBINEJE19974 X-UIDL: M\RI!aK8"!3->!!HCb"!

1) pistol is hand-held portable condition - C2pc can be used with portable grants to allow co-location for hand-held use.

2) TCB can do the C2pc's.

From: Greg Kiemel [mailto:gkiemel@nwemc.com] Sent: Tuesday, November 25, 2003 6:03 PM To: Tim Harrington
Cc: dghizzzone@nwemc.com; kvalleen@nwemc.com Subject: Intermec 700C questions

Tim,

Thanks for speaking with me today. The subject devices are:

FCC ID: HN2SB555-2 limited modular approval, portable, CDMA radio used in 700C
FCC ID: HN22011B-2 limited modular approval, portable, 802.11b radio used in 700C
FCC ID: EHARFID915PCC-6 limited modular approval, handheld, 900 MHz FHSS used in Model IP3 pistol-grip RFID Tag reader.

The IP3 RFID tag reader attaches to the bottom of the 700C. In this configuration, the 700C cannot be used in any body-worn configurations (holsters, belt clips, lanyards, etc). Also, it cannot be used as a cell phone near the head. In this configuration the CDMA radio is for wide area network (WAN) data transmission only.

Intermec would like to make Class II permissive changes to the subject grants for this new exposure condition.

1) Can we add a mobile exposure condition (the co location of the IP3) to the portable grants only (rather than to the mobile grants, or both mobile and portable grants)? Intermec would rather label all 700Cs with the portable FCC IDs.

2) If the answer to #1 is yes, can a TCB issue the Class II even though the TCB exclusion list prohibits a TCB from issuing the portable grants (dominate xmitter requires SAR, non-dominate co-located xmitter > 5mW)?

Since the change is for a handheld exposure condition that does not require SAR data, I would think the answer is yes. I would like your confirmation.

Thank you for your attention to this matter.

Best regards,

Greg Kiemel, Director of Engineering
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