



Garmin International, Inc.
1200 East 151st Street
Olathe, Kansas 66062
P: 913-397-8200 F: 913-397-8282

November 9, 2007

Mr. Scot D. Rogers
Rogers Labs, Inc.
4405 West 259th Terrace
Louisburg, KS 66053

Re: FCC ID: IPH-01175 application FCC ID label location

Mr. Rogers,

Regarding the FCC ID label location in the application for FCC ID: IPH-01175, Garmin International wishes to place the FCC ID label on the inside surface of the battery compartment, which makes up the bottom two-thirds of the rear of the unit. The front side of the unit is devoted to the display screen and controls of the unit leaving no area available for the FCC ID label. The upper portion of the rear of the unit is devoted to various cable connectors precluding this as a possible location of the FCC ID label. The battery compartment is an area requiring frequent and repeated user attention as the unit operated on two AA alkaline batteries. Since the unit will not ship with batteries, the user will be forced to look at the FCC ID label before ever using the product. Furthermore, they will look at the label each time they change the batteries in the product. In addition to the label being frequently viewed by the user, we believe that placing the FCC ID label on the inside surface of the battery compartment will increase its expected lifetime far beyond what could be expected if it was on the outside surface of the unit and subjected to the rigors of outdoor use.

The battery compartment is easily accessible and the batteries are removable without the requirement of any tools in order to do so. The identifier would be visible on the interior surface of the battery compartment as soon the battery door is removed in order to replace the batteries. The identifier is placed in such a location that it will be visible to the user whenever the batteries are replaced. The unit will be initially provided with no batteries installed, so the user will be forced to look at the ID prior to operating the unit.

Sincerely,

John P. Farley

A handwritten signature in black ink that reads "John P. Farley".

Senior Compliance Engineer
Garmin International

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