

NORTHWEST EMC, INC.

22975 NW Evergreen Parkway, Suite 400
Hillsboro, OR 97124

November 16, 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 EM3420 transmitter, FCC ID: EHAEM3420. It is a CDMA radio module. It was granted limited modular approval as a portable device for use in Intermec's handheld computer, Model 700C. There have been no changes to the radio or its antenna. Approval is sought for use two different mobile co-located radio configurations. Please reference the attached email from the FCC that approves the TCB eligibility for processing this application.

1st Configuration

Intermec has a previously certified RFID radio module (FCC ID: EHARFID915PCC-6) that is installed inside Intermec's Model IP3. The IP3 is an optional pistol grip accessory that attaches externally to the bottom of Intermec's 700C. The 700C is a handheld computer that contains three co-located radio modules (CDMA (or GSM), 802.11(b) and Bluetooth). All radios have been previously certified for portable, co-located use in the 700C (FCC ID: HN22011B-2 (802.11b), HN2ABTM3-3 (Bluetooth) or EHABTS080 (Bluetooth), HN2SB555-2 (CDMA) or EHA700C-SMC45-1 (GSM)). Please note that the CDMA and GSM radios are never installed in the same 700C. Only one Bluetooth radio can be installed in the same handheld computer. Each radio transmits through its own antenna.

This Class II application demonstrates compliance with FCC requirements while the EM3420 module (FCC ID: EHAEM3420) installed in the 700C is co-located with the IP3 (FCC ID: EHARFID915PCC-6). 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 (or GSM) radio, is for wide area network (WAN) data transmission only.

Since the IP3 uses the same IRDA interface port as the Bluetooth radio, the Bluetooth and RFID radios cannot transmit simultaneously. All other radios can transmit simultaneously. Each radio transmits through its own antenna.

2nd Configuration

Intermec's 6820 printer with Bluetooth transmitter (FCC ID: EHABTS080-1) includes a docking station for Intermec's handheld computers, Models 700C and 730. Each radio transmits through its own antenna.

This Class II application demonstrates compliance with FCC requirements while the EM3420 module (FCC ID: EHAEM3420) installed in the 700C is co-located with the 6820 printer (FCC ID: EHABTS080-1). 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 (or GSM) radio, is for wide area network (WAN) data transmission only.

The technical reports and RF Exposure exhibits are supplied in support of the two mobile co-location conditions described above

The technical reports and exhibits demonstrate compliance with FCC rules 47 CFR 22H and 24E.

Your efforts in reviewing this application are greatly appreciated.

Best regards,

A handwritten signature in blue ink, appearing to read "G. Kiemel". The signature is stylized with a large "G" and a long horizontal stroke.

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 P2PXCS01.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
P2PXCS01.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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