

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

February 13, 2006

RE: Zebra Technologies Corporation

FCC ID: I28MD-ZLAN11B

I have a few comments on this Application.

1. The RF exposure and grant notes cite 2.5 cm. The power is 45 mw, antenna gain almost 1 dB. By definitions provided to us, this would require SAR since exclusions only cite 49 mW for > 2.5 cm and this is about 55 mW. We MUST look at worse case of Conducted and EIRP. Therefore SAR evaluation must be performed. Please submit a SAR evaluation.

Response: Despite the antenna specifications supplied by the manufacturer, measured EIRP was 2.9 mW. As this value was significantly lower than what was expected based on the conducted power and antenna specifications, a test was run using the EUT and horn antenna. The measured EIRP with the horn antenna was what was expected based on the conducted power and horn gain. This test verified the test setup and EUT. We also measured a second EUT antenna with results similar to the original measurements. The lower antenna gain of the EUT antenna in actual use is attributed to the inclusion of the antenna cable which includes a ferrite. This ferrite was added during testing for the original certification to mitigate failing spurious emissions. This ferrite is also attenuating in-band signals. Therefore, based on the conducted power and measured EIRP we feel that the EUT continues to meet the requirements of the TCB exclusion list.

2. The same problem exists for Industry Canada. This requires appropriate new RSS-102 attestation given in our forms and according to standards would require SAR also.

Response: Please see above.

Thank you,
Douglas E. Noble
Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination.

Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.