



**UltraTech**  
Group of Labs



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November 19, 2001

**FEDERAL COMMUNICATIONS COMMISSION**

7435 Oakland Mills Road  
Columbia, MD 21046  
USA

**Subject:** Limited Modular Approval Application under FCC 47 CFR, Parts 2 and 90 (Subpart I) - Licensed Non-Broadcast Radio Transceivers Operating in the frequency bands 806-821 MHz (25 kHz Channel Spacing).

**Applicant:** KEYCORP LIMITED

**Product:** MOBILE PAYMENT TERMINAL

**Models:** K78-202 & K78-204/LP9100

**FCC ID:** P3AK78-2XX

Dear Sir/Madam,

As appointed agent for **KEYCORP LIMITED**, we would like to submit the application to Federal Communications Commission for certification of the above product.

The Mobile Payment Terminal, Models K78-202 and K78-204/LP9100 are exactly identical except for the following difference:

- The Models K78-204 and LP9100 are exactly identical. The differences of the model numbers are only for marketing purposes. It has an additional PSTN line-modem port (RJ-11)
- Model K78-202 is exactly identical to Model K78-204 but it has no PSTN line modem.

Since there is no mechanical and electrical difference in radio circuitry, the model K78-204/LP9100 is used for testing for compliance with FCC Part 90 and it shall represent for both models.

The Models K78-202 and K78-204/LP9100 incorporates a Radio transceiver module Model 802D manufactured by Research In Motion Ltd. (RIM), which is approved as a modular radio transceiver, FCC ID: L6AR802D-2-O. This module is supplied as a complete OEM unit, with no tuning or modifications required for operation in this device. The only change to this modular transceiver is the transmitter's antenna.

UltraTech Engineering Labs Inc. will provide the following test data:

- ERP Measurements
- Transmitter Spurious/Harmonic emission measurements
- SAR Measurements

Details of all other test requirements and data will be provided by RIM. Please review all necessary files uploaded to the FCC OET site.

If you have any queries, please do not hesitate to contact us by our TOLL FREE number:

OUR TELEPHONE NO.: 1-877-765-4173

Yours truly,



Tri Minh Luu, P. Eng.,  
V.P., Engineering

TML/DH

Encl.