

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

October 14, 2002

RE: Monarch Marketing Systems, Inc, dba Paxar Corporation
FCC ID: GU67410

After a review of the submitted information, I have a few comments on the above referenced Application.

1) The sample label shows the labeling placed on the Ethernet interface board. However, there is a concern that a different PCMCIA card could get inserted into the device which would mean that the label would no longer be valid. Therefore, the labeling should be placed on the transmitter portion of the device itself (PCMCIA Card). Please note that the FCC ID placed on the PCMCIA card is no longer considered valid because of the change in antennas from its original submittal. Also, please note that from our research the PCMCIA card used is only approved for an integrated internal antenna, not external antennas as used.

Response: Please refer to the revised label exhibit, uploaded with this response, that reflects the label placement on the front of the PCMCIA card.

2) It is recommended that the label placed on the exterior of the device contain reference to the internal module and the FCC ID on a single line. Please refer to the attached file Section 6.

Response: Please refer to the revised label exhibit uploaded with this response.

3) Please provide a cover letter addressing the modular requirements as given in the attached file provided. This letter should also address the limited modular aspect of the application as we discussed, and the applicability of testing it in the configuration it was versus testing it as a standalone.

Response: Please refer to the modular approval letter uploaded with this response.

4) It is recommended that this application cover the PCMCIA Card only as a limited module approval.

Response: Please refer to the letter referenced in #3. The manufacturer requests a limited modular approval on the wireless print server model 7410.

5) Please provide an updated antenna connector attestation that references the modular PCMCIA card (instead of the printer model numbers). Also, since there are 3 possible connector points (at the module, at the antenna, and the flying lead between the two), please adjust the attestation letter to clearly refer to using non-standard connections between all connections between the module and the antenna.

Response: Please refer to the revised client attestation letter uploaded with this response.

6) Please explain how the device was tested in 3 orthogonal planes as stated in 2.1 of the test report.

Response: The right-angle antenna used on the plastic housing is designed with a 360 degree swivel. This allows the antenna to be positioned in the XY, YZ and ZX planes. The stub antenna used on the metal housing is fix-mounted, so it was necessary to physically position this antenna with respect to the orthogonal planes.

7) Since the backplane of both models tested appears to be metal, please provide more descriptive information (drawings, etc.) regarding the metal and plastic housings referenced in the test report.

Response: The backplane on both models is an integral part of the main metal chassis. The chassis is used in both models with plastic housing and metal housing. All printer circuit boards and other control modules are directly secured to the main metal chassis.

8) Please adjust the information in Table 2-2 (FCC ID's, etc) as we discussed today.

Response: Please refer to the revised test report uploaded with this response.

9) Please explain what test distance was used for the measurements made in table 5.3.

Response: The test distance was three meters.

10) Please explain which antenna is expected to be used with which enclosure.

Response: The stub antenna is used only with the metal housing, and the right-angle antenna is used only with the plastic housing.

11) FYI, From our discussion today, the limited modular approval will be for the PCMCIA card for use in print servers manufactured by Monarch Marking systems only and must use a metal or plastic case as specified in the application.

Response: Please refer to the modular approval letter referenced in #3 above.

12) FYI, The conducted emissions limits are not consistent. The plastic housing was showing Class B limits, while the metal housing was showing Class A limits. However, both sets of measurements meet with the 15.207 requirements.

Response: Thank you for pointing this out.

13) FYI, I believe the Canadian document number on the label should be ICES-003, not ICES-0003.

Response: Thank you for pointing this out.

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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.