

Honeywell International Inc

9680 Old Bailes Rd, Fort Mill, South Carolina 29707, United States

Date: **October 4, 2018**

FCC ID: **HD5-CN85L1N**

Company: **Honeywell International Inc**

To Whom It May Concern,

Request for Confidentiality

Pursuant to the provisions of Sections 0.457 and 0.459 of Commission's rules (47CFR§§0.457, 0.459), we are requesting the Commission to withhold the following attachments as confidential document from public disclosure indefinitely.

- Schematic Diagram
- Block Diagram
- Parts List
- Tune-up Procedure
- Operational Description
- Software Operational Description

Above mentioned document contains detailed system and equipment description are considered as proprietary information in operation of the equipment. The public disclosure of above documents might be harmful to our company and would give competitor an unfair advantage in the market.

In additional to above mentioned documents, pursuant to Public Notice DA 04-1705 of the Commission's policy, in order to comply with the marketing regulations in 47 CFR §2.803 and the importation rules in 47 CFR §2.1204, while ensuring that business sensitive information remains confidential until the actual marketing of newly authorized devices. We are requesting the commission to grant short-term confidentiality request on the following attachments until **180 days** after the Grant Date of Equipment Authorizations.

- ◆ External Photos
- ◆ Internal Photos
- ◆ Test Setup Photos
- ◆ Users Manual

It is our understanding that all measurement test reports, FCC ID label format and correspondent during certification review process cannot be granted as confidential documents and those information will be available for public review once the grant of equipment authorization is issued.

Declaration of Conformity

We will apply the Declaration of Conformity procedure to the class B computer peripheral portion of this composite filing.

The test result demonstrates compliance and is performed by an US MRA laboratory, **Bureau Veritas Consumer Products Services (H.K.) Ltd., Taoyuan Branch.**

Label Location Declaration

There is no other space for putting the label on our device, except for the space of the battery compartment of this device. The label will be put under the battery compartment and it is visible to the users

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as they purchase the product and install the battery.

Declaration Letter for BT/WLAN

This is a WLAN/Bluetooth combination antenna. This WLAN/Bluetooth co-existence mechanism is to ensure that the WLAN and Bluetooth transmitters would not simultaneously operate. Therefore, WLAN and Bluetooth antenna for this device should not be considered to be able to transmit simultaneously.

Though the users can use WLAN and Bluetooth simultaneously, but the real situation is that WLAN and Bluetooth are used by time sharing and no overlap transmission.

Declaration Letter for WLAN channels

The device does not support any non-US channels in all the operational mode(s). All non-US frequencies, US 2.4G channel 12-13 and Country code selection are disabled through proprietary software and are not user changeable.

DTS-UNII Device Declaration Letter

We have declared below featured for FCC equipment authorization,

(1) DFS Device –

- ☐ Master
- ☐ Client with Radar detection capability
- ☒ Client without radar detection capability
- ☐ N/A

(2) Active / Passive Scanning , ad-hoc mode access point capability

Frequency Band (MHz)	Active Scanning (the device can transmit a probe (beacon))	passive scanning (where the device is can listen only with no probes)	Ad Hoc Mode or WIFI Direct capability	Access point capability
5150-5250	☒ Yes , ☐ No	☐ Yes , ☒ No	☒ Yes , ☐ No	☒ Yes , ☐ No
5250-5350	☐ Yes , ☒ No	☒ Yes , ☐ No	☐ Yes , ☒ No	☐ Yes , ☒ No
5470-5725	☐ Yes , ☒ No	☒ Yes , ☐ No	☐ Yes , ☒ No	☐ Yes , ☒ No
5725-5850	☒ Yes , ☐ No	☐ Yes , ☒ No	☒ Yes , ☐ No	☒ Yes , ☐ No

(3) Country code selection ability - ☐ Yes , ☒ No

If yes, please explain how it was implemented: (please also help to provide detail of options for each country selection)

(4) Meet 15.202 requirement - ☒ Yes, ☐ No,

Please check below:

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☐ A master device is defined as a device operating in a mode in which it has the capability to transmit without receiving an enabling signal. In this mode it is able to select a channel and initiate a network by sending enabling signals to other devices

☒ A client device is defined as a device operating in a mode in which the transmissions of the device are under control of the master. A device in client mode is not able to initiate a network.

(5) For client devices that have software configuration control to operate in different modes (active scanning in some and passive scanning in others) in different bands (devices with multiple equipment classes or those that operate on non-DFS frequencies) or modular devices which configure the modes of operations through software, the application must provide software and operations description on how the software and / or hardware is implemented to ensure that proper operations modes cannot be modified by end user or an installer.

☒ Apply, ☐ No Apply, (If apply, please help to provide explanation on it was implement, and how software was controlled)

[Factory set only.](#)

MIF for HAC RF Interference Evaluation

This Hearing Aid Compatibility Requirement is going to be certified under **ANSI C63.19-2011 version per Part 20.19.**

The M rating was determined by measuring the maximum steady state average E-field values in dB (V/m) as documented in the HAC report and adding the MIF value in dB (V/m) using pre-determined values provided by Speag under UID 10021 DAA (16.11.2016) / UID 10011 CAB (16.01.2014).

The Speag-reference documentation for supporting the pre-determined MIF value is Schmid & Partner Engineering AG, **UID SUMMARY (Communication Systems for Calibration, Issued Date 2017/12/05).**

We confirm that the Speag simulation provided represents all the air interface modes applicable for a HAC rating for this handset.

Should you have any question or comment regarding this matter, please have my best attention.

Sincerely yours,



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