



TECHNOLOGY
SOLUTIONS UK LTD

part of **HID**

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DECLARATION OF SIMILARITY

Date: 14/11/2025

To:
FEDERAL COMMUNICATIONS COMMISSIONS
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046

Dear Sir or Madam:

We [Technology Solutions \(UK\) Ltd](#) hereby declare that product: [RFID READER](#), model [3138-AX1-US](#) is similar to – with differences described below - as model: [3138-AS1-US](#) tested by BACL (New Taipei Laboratory), the results of which are featured in *BACL (New Taipei Laboratory) Project Number: RXZ241220075RF07, RXZ241220075RF08, RXZ241220075RF09*. Either model can be powered with accessory model 31PH-01 or 31PH-02, with differences described below, and in the following Appendix.

A description of the differences between the tested model and those that are declared similar are as follows:

FCC ID: [S6J3138](#)

Product aspect	P/N: 3138-AS1-US	P/N: 3138-AS2-US	P/N: 3138-AX1-US	P/N: 3138-AX2-US
Name	3138 BLUETOOTH® UHF RFID RAIN READER	3138 BLUETOOTH® UHF RFID RAIN READER	3138 BLUETOOTH® UHF RFID RAIN READER	3138 BLUETOOTH® UHF RFID RAIN READER
HVIN	3138-AS1-US	3138-AS2-US	3138-AX1-US	3138-AX2-US
Application	RFID and barcode reading	RFID and barcode reading	RFID reading	RFID reading
2D Barcode scan engine	Yes	Yes	No	No
RFID Reader	3138-AS1-US	3138-AS1-US	3138-AX1-US	3138-AX1-US
Power Handle (accessory)	31PH-01	31PH-02	31PH-01	31PH-02
Accessory charging connector	USB Type-C Hybrid Contact Receptacle	8 Position Spring Mating Target Connector	USB Type-C Hybrid Contact Receptacle	8 Position Spring Mating Target Connector
Charging interface	USB cable (supplied)	USB cable (supplied) via approved charging cradle	USB cable (supplied)	USB cable (supplied) via approved charging cradle

Please contact me should there be need for any additional clarification or information.

Best Regards,

Responsible Party Signature

Company Name: [Technology Solutions \(UK\) Ltd](#)
Contact Person: [Bertrand Sallet](#)
Title: [VP Hardware Engineering & TSL Product Segment, IDT](#)
E-mail: bertrand.sallet@hidglobal.com
Address: [Suite A, Loughborough Technology Centre, Epinal Way, Loughborough, Leicestershire, LE11 3GE, United Kingdom](#)

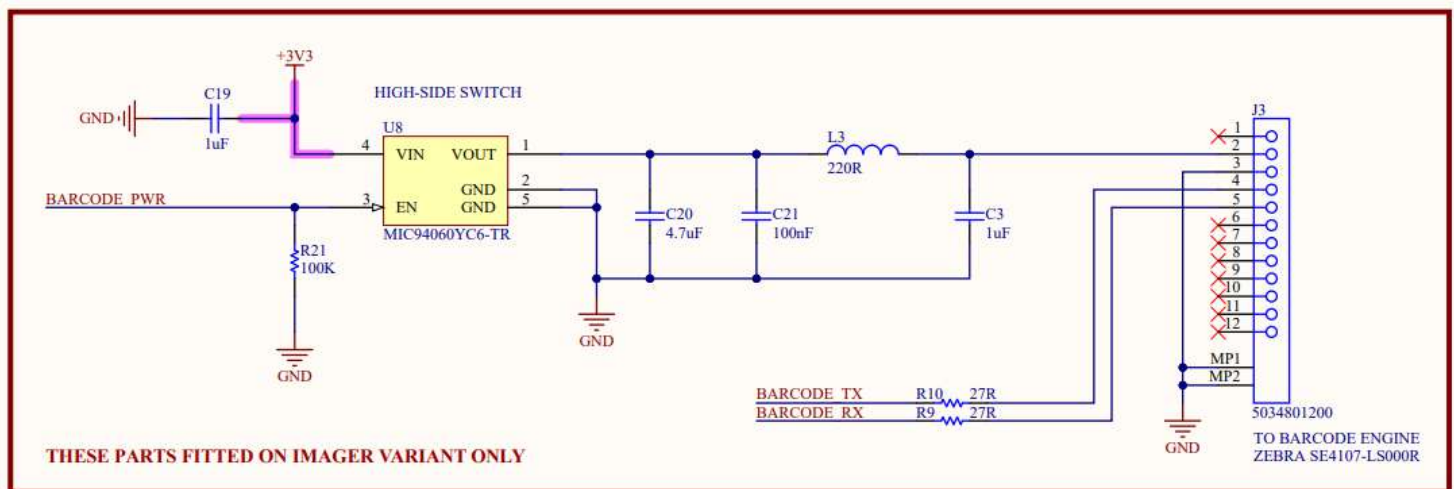


Appendix

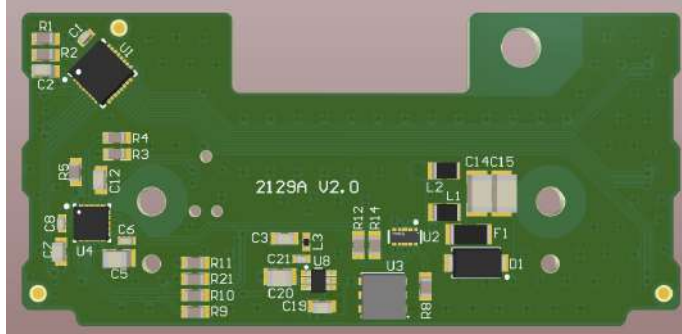
There are two build variants of the UHF RFID Reader

- 3138-AS1-US (with barcode imager)
- 3138-AX1-US (without barcode imager)

The only change is on the 2129 LED PCB behind the antenna where the barcode imager would connect. The barcode imager and the cable that connects it to the PCB is either fitted or not fitted (J3 connection to barcode imager).

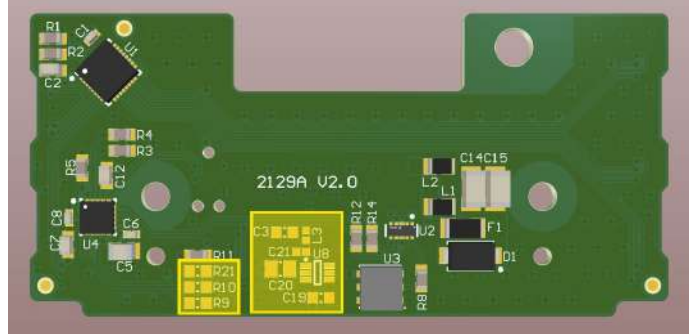


Imager

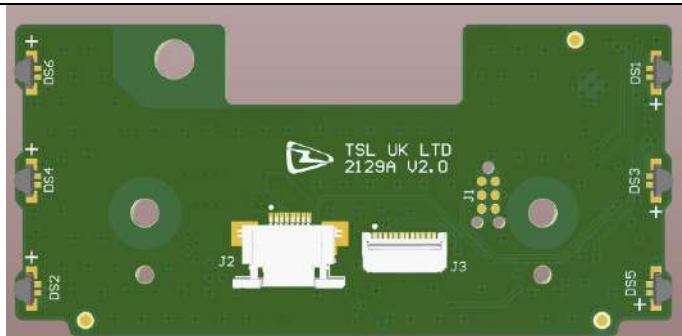


Front PCB

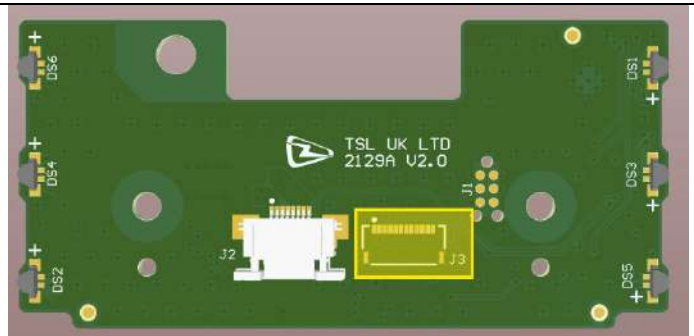
No Imager



Front PCB



Rear PCB



Rear PCB

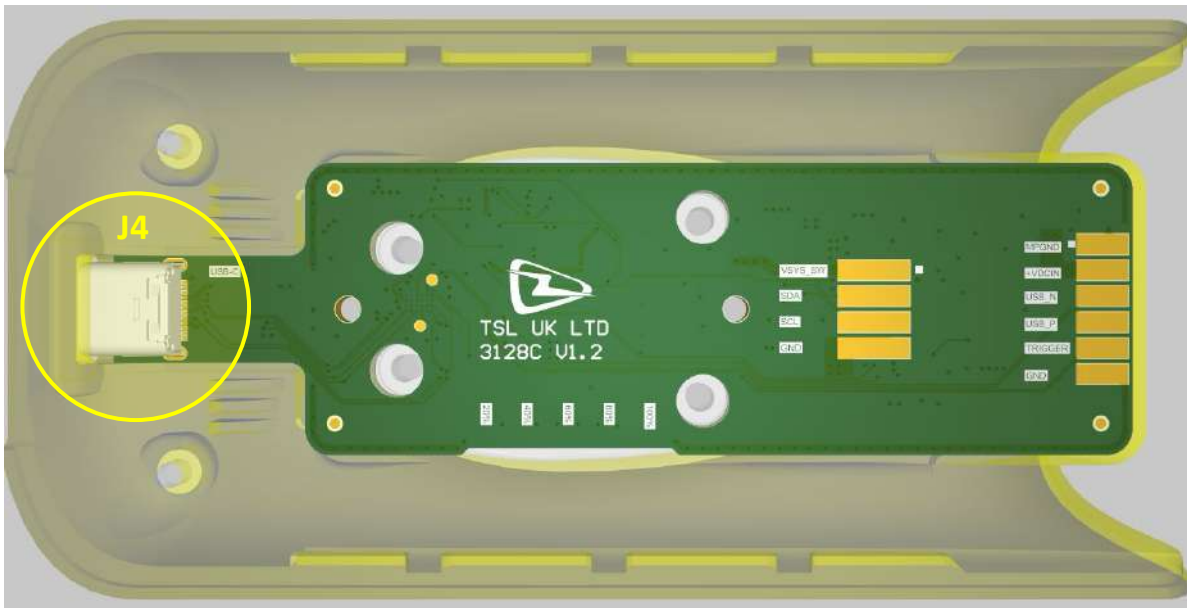
The differences are highlighted in yellow and are not present in the NON-IMAGER version.



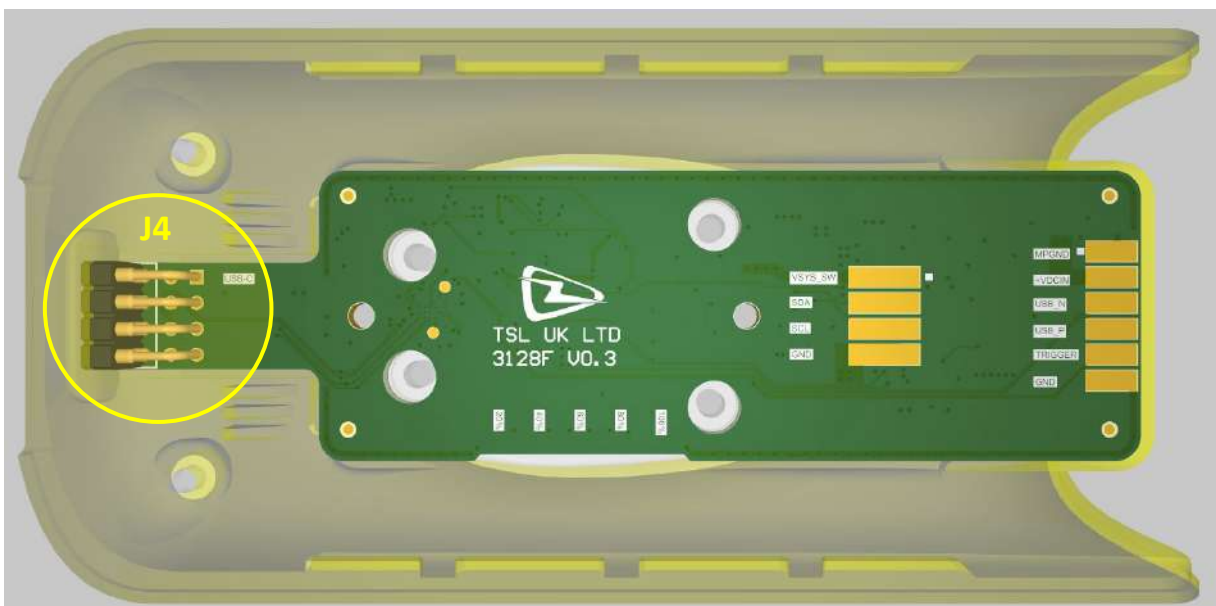
There are two build variants of the Power Handle.

- 31PH-01 (USBC)
- 31PH-02 (8 way dock)

The layout of the two Power Handles are identical apart from the end connector. There are two PCBs but these only vary based on the connector fitted (J4) – either an 8 way connector or a USBC connector.



PCB 3128C, used within 31PH-01. Yellow circle shows connector J4. In 3128C, J4 is a USBC connector.



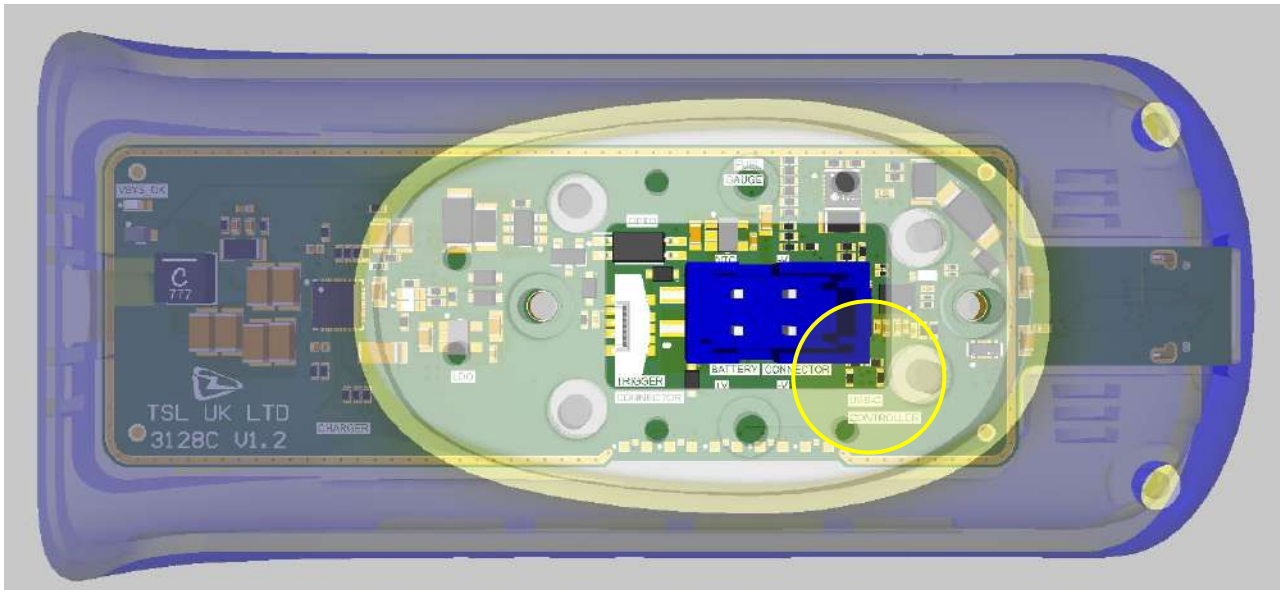
PCB 3128F, used within 31PH-02. Connector J4 changed to an 8-way dock connector.



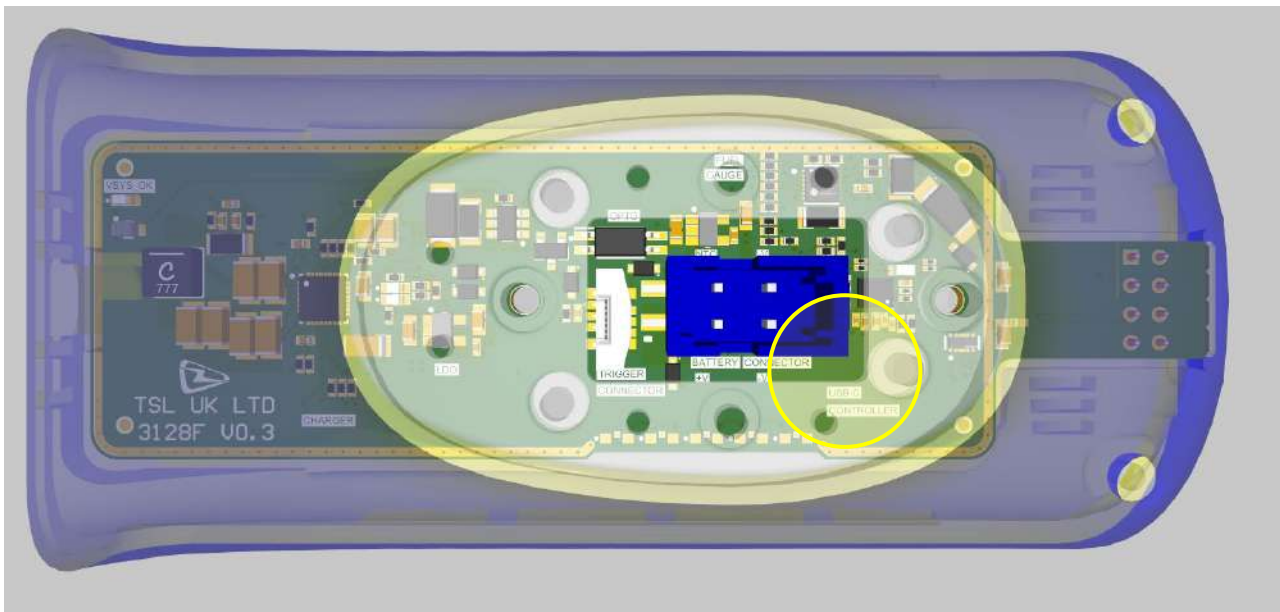
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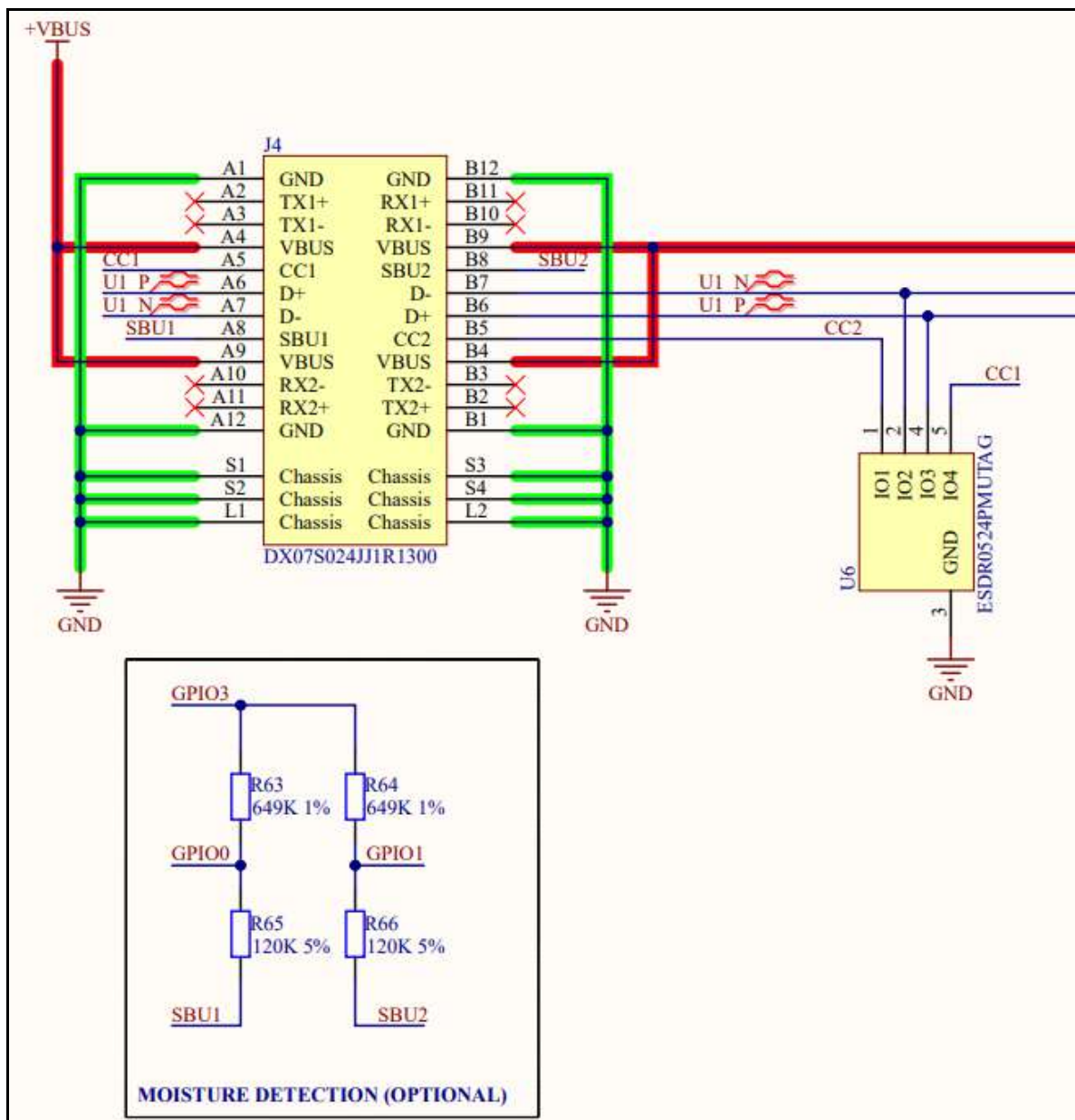
PCB 3128C, used within 31PH-01. Yellow circle shows the four resistors for the moisture detection on the USB-C socket.



PCB 3128F, used within 31PH-02. Four resistors gone.



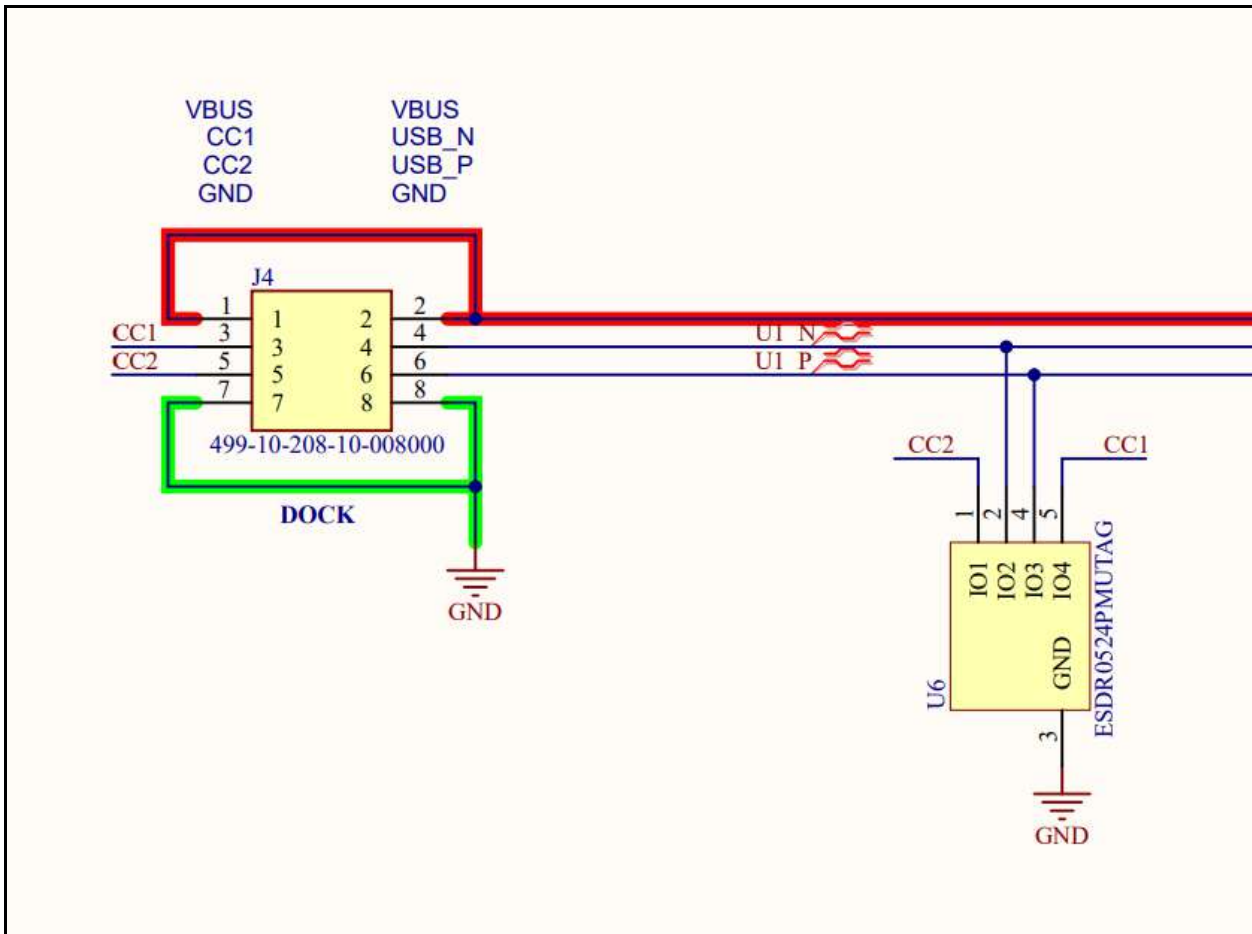
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Partial schematic for PCB 3128C, showing how VBUS, CC1, CC1, U1_N, U1_P, GND route to the rest of the circuit.



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Partial schematic for PCB 3128F, showing how VBUS, CC1, CC2, U1_N, U1_P, GND route to the rest of the circuit.