

In

Dear Tim,

Please confirm reply to your comments below "==>".

We will upload the attached documents from ATCB web, once we got reply from you.

1) One of the block diagrams and operational description shows both Bluetooth and WLAN. Please explain as this application appears to only support Bluetooth. Is this integrated? Is this a user installable module? Is this permanently installed? Is it a previously approved module? Please provide more information in effort to properly ensure the application properly handles the WLAN portion (if applicable).

==>WLAN module(T87SS22BXXM) is previously approved module, so the applicant installed the WLAN module with displaying CONTAINS FCC ID:T87SS22BXXM on the label. Bluetooth is permanently installed, so this time, we would like to issue FCC- \$B!- (Bcertificate for Handy Terminal with Bluetooth not as Bluetooth Module.

2) For internal photographs, have the top and bottom photographs of all boards been provided? If not, please provide.

==>Please find attached "Revised FCC_Photo_Internal_.pdf".

3) The Bluetooth appears to be a modular Bluetooth board. The top and bottom photographs of this should also be provided as part of the internal photographs.

==>The Bluetooth is permanently mounted on main circuit board.

4) The Bluetooth module photographs should also include a photograph with the shield removed as part of the internal photographs. Please provide.

==>Please see page 2 of "Operational Description BT (Confidential).doc".

5) SAR was provide, but for a configuration involving WLAN. However the application appears to be for BT. Currently SAR has not been reviewed since it is assumed the application is only covered for Bluetooth. Please comment/explain.

==>We submitted SAR test report just for your reference. This time the application is for Handy Terminal with Bluetooth.

6) Users manual mentions information for both WLAN and BT. Currently only BT statements have been reviewed. However if both BT and WLAN are applicable and can operate at the same time, then it appears the non-colocation statement should be adjusted to state - \$B!H- (Bother than the Bluetooth and WLAN- \$B!- (B covered by the manual (or a similar statement).

==>There are no simultaneous transmissions of Bluetooth and 802.11b. Please see "No Simultaneous transmissions.doc".

7) If this device incorporates both BT and WLAN, and the report mentions they do not TX at the same time. Please explain what precludes them from transmitting at the same time. For instance, does the software allow operation at the same time and are the antenna < 20 cm apart. If not, they are not considered co-located. If so, then they are co-located. If co-located, then worse case SAR configuration for WLAN should also include WLAN + BT at the same time. SAR doesn- \$B!G- (Bt appear to address this . Please explain.

==>Please see "No Simultaneous transmissions.doc".

8) The handheld appears to be Class B and also connect to a PC and therefore considered as a PC peripheral. The device does not appear to be DoC approved. Please explain how this device is approved as a PC Peripheral (i.e. DoC- \$B!G- (Bd, Certified, Considered Class A device and therefore verified, etc.). Note that currently the application does not appear to request Certification as a PC peripheral and does not appear to be DoC labeled. Please explain.

==>There is no port open to user to connect to the PC. We revised the users manual. Please confirm "Revised Users Manual.pdf".

9) The device can be charged from AC. Please explain if the device can function while charging. Note that if so, then AC emissions would be considered applicable.

==>There is no port for AC adapter. When user charge the battery, they always take out the battery from handy terminal and use separate charger. See users manual.

Best Regards,

Keijiro
UL Apex