



19 December 2019

To Whom It May Concern:

Impinj requests that “Professional Installation” is listed on the FCC certification. In justifying this request, we evaluated our Impinj R700 RAIN RFID reader product against FCC KDB 353028 D01 section II A 2 c criteria as follows:

c) Professional installation

- i) Professional installation must be justified in the filing, and grant condition must state “This device must be professionally installed.”

RESPONSE / JUSTIFICATION – Agreed, Professional installation required will be listed on certification and stated in the operation and installation manual

- ii) Professional installation does not permit use of any antenna with the transmitter; the permitted types of antenna must be specified.

RESPONSE / JUSTIFICATION – Approved and tested antennas are listed in the operation and installation manual

- iii) The applicant should address the following items when justifying professional installation.

- (1) To qualify for professional installation, the applicant must explain why the hardware is not readily available to average consumer.

RESPONSE / JUSTIFICATION – Impinj does not market to sell this product to consumers and does not sell thru consumer channels

- (2) Marketing—Device cannot be sold via retail to the general public or by mail order; it must be sold to authorized dealers or installers only.

RESPONSE / JUSTIFICATION – We only offer this product to licensed and trained Solution Providers that sign an agreement with Impinj

- (3) Filing must show that intended use is not for consumers and general public; rather device is generally for industrial/commercial use.

RESPONSE / JUSTIFICATION – Impinj’s licensed Solution Providers develop specific solutions for industrial or retail customers to use RFID based systems in their factories or other facilities

- (4) Explain what is unique, sophisticated, complex, or specialized about the equipment that REQUIRES it to be installed by a professional installer?

RESPONSE / JUSTIFICATION – Impinj’s R700 RAIN RFID Reader does not have a default mode of operation (out of the box). The Impinj R700 RFID reader is one component of larger industrial system. To perform a useful function, requires that one of Impinj’s Solution Providers develop a system solution, which typically includes custom software, RF system design, validation testing and installation. Impinj’s Solution Providers have expertise in RF, systems, and software engineering that enable to develop overall solutions that they market to end industrial and retail customers.



iv) Other professional installation requirements.

(1) Installation must be controlled.

RESPONSE / JUSTIFICATION – Impinj’s licensed Solution Providers install and validate the RFID systems via design plans, installation procedures, and test verification plans that they develop

(2) Installed by licensed professionals (e.g., device sold to dealer who hire installers).

RESPONSE / JUSTIFICATION – Impinj’s licensed Solution Providers sign licensing / partner agreement with Impinj

(3) Installation requires special training (e.g., special programming, access to keypad, field strength measurements made).

RESPONSE / JUSTIFICATION – Impinj’s licensed Solution Providers are required to obtain on-site training classes offered by Impinj personal. The training includes determining cable losses, safe operating distances, and other factors to correctly configure the TX power level to operate within FCC rules.

Sincerely,

A handwritten signature in black ink that reads "Michelle Branum". The signature is fluid and cursive, with a long, sweeping underline.

Michelle Branum, CKC CS, on behalf of  
Bill Ashley  
VP of Hardware Engineering  
Impinj, Inc.