



Date: June 20, 2011

Compliance Certification Services  
Director of Certification Division  
47173 Benicia Street  
Fremont, CA 94538

### Justification for RF exposure compliance

To whom it may concern:

In accordance with FCC section 2.1093, when the portable device is operating under WMTS / Part 95 Subpart H technical requirements, Routine RF evaluation is required to demonstrate RF exposure compliance.

The FCC, with full knowledge that patients within a healthcare facility wear these devices continuously in close proximity to the body, determined field strength limitations on transmitters operating in the Wireless Medical Telemetry System ( WMTS ).

Based upon information provided by the FCC, using the rule-of-thumb that SAR~P, for all P transferred into 1 g then 1.6 mW/g requires 1.6mW, which is above the output power of the device described in this certification application.

ZM-520PA RF output power is specified 1mW +50%, -50%, therefore maximum RF output power is less than 1.5mW. If all of the RF output power concentrates any 1gram of tissue, literally the SAR does not exceed 1.6mW/g.

As the conclusion, we justify that FCC section 2.1093 is not applicable to the ZM-520PA.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'Makoto Magara', written over a horizontal line.

Makoto Magara, Senior Manager  
NIHON KOHDEN CORPORATION