



Date: June 19, 2009

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-540PA 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-540PA.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'M. Magara'.

Makoto Magara, Senior Manager
NIHON KOHDEN CORPORATION