



January 21, 2004

RE: Data Critical Corporation

FCC ID: BQI01DT-4500

I have a few comments on the above referenced Application.

- 1) FYI.....A confidentiality letter was provided. However the items listed were not provided, nor are the necessary for this application. Therefore this exhibit is being ignored.

Acknowledged.

- 2) Please provide a copy of correspondence with the FCC stating that extending the frequency range may be done under a permissive change (as given in an email sent earlier).

US Technologies has uploaded a copy of correspondence with the FCC stating that extending the frequency range may be done under a permissive change (as given in an email sent earlier).

- 3) Please provide a separate cover letter explaining the purpose of the Class II Permissive Change. This should adequately address the differences/changes of the device and justification for Class II Permissive Change. It is also important in certain cases to mention what has not been changed.

US Technologies has uploaded a Letter explaining the purpose of the Class II Permissive Change, adequately addressing the differences/changes of the device and justification for Class II Permissive Change.

- 4) The FCC ID given on page 2 and 21 of the report does not appear to match the FCC ID for the application. Please verify and adjust as necessary.

The correct FCC ID for all pages is BQI01DT-4500. These pages have been corrected within the report.

- 5) Please note that the original FCC ID is BQI01DT-4500, not BQIO1DT-4500 (zero vs. O). Please correct for consistency throughout the report.

The correct FCC ID for all pages is BQI01DT-4500. These pages have been corrected within the report.

- 6) Please provide a separate exhibit containing just the test configuration photographs only.

We have provided a separate exhibit containing just the test configuration photographs only

- 7) Page 10 of 58 appears to contain frequencies outside of the TX band authorized. Please explain.

These frequencies were additional information supplied by the client that is not pertinent to the operating frequencies of the EUT. They have been removed from the Test Report.

- 8) Page 9 and 11 appear to contain the same frequency list. Please explain.

These pages do contain the same frequency list. Page 9 was provided to exhibit the original frequency list. Page 11 lists the additional frequencies added to the unit from the frequency list. We have deleted page 9 from the report, and retained page 11 to exhibit the additional frequencies added to the EUT from the frequency list.

- 9) Page 11 appears to list channel 0h, which doesn't exist. Please explain.

Channel 0h was a typographical error, from the manufacturer's original list of added frequencies, provided to US Technologies. A corrected exhibit has been provided.

- 10) It is mentioned that the worse case results were obtained with the device positioned in the X-axis. Please confirm this is shown in the test configuration photographs, or if necessary provide the correct test configuration photographs.

We have provided separate, corrected photos to account for the discrepancy in power output (see next item), by positioning the data leads, which act as the EUT antenna, in the original grant configuration. The position is confirmed as correct in the x axis, as determined by testing the x, y, and z axis.

- 11) The highest emissions measured for the fundamental appears to be 3.5 to 3.9 dB below the power shown in the original application (note that measurements were listed as Peak). Please note that power levels should agree within +/- 0.5 dB for conducted measurements, or +/- 3 dB for radiated measurements for a Permissive Change application (see attached information). Additionally, the original device appeared to be positioned differently for the patient leads which could attribute to this fact.

We have re-tested the unit with corrected positioning of the patient leads, which has corrected this discrepancy. A corrected report has been uploaded.

- 12) It is desired to test the device in a continuous mode of TX. However, the plots provided appear to show the device was transmitting with some type of duty cycle. Please explain the duty cycle present during testing (TX on time, TX off time, period, etc.). This information is necessary to ensure the bandwidths used during testing are acceptable. Also, how was the device effectively maximized given the periodic nature of the signal?

The duty cycle is as follows:

Period: 35 milliseconds

Tx on time: 1 millisecond

The US Tech technician conducting the testing was aware of the periodic nature of the signal and exercised diligent care in manipulating the unit and cables. He also exercised strong diligence in recording the peak value for each fundamental signal in all channels.

In addition, we have spot checked the 2 worst case harmonics for Spurious emissions and verify the data accuracy.

- 13) Please call to discuss peak emissions given in section 2.8 and the average measurements given in section 2.9 of the test report. Note that 95H does not reference peak emissions, although they are necessary in order to derive the average measurements.

Peak measurements were taken to help derive the average measurement. Peak plots will be removed, as they were provided for informational purposes only.

- 14) Please provide information at the bandedges of 608 - 614 MHz for the lowest and highest channels to show compliance to the 200 uV/m requirement.

Band edge plots have been uploaded for highest and lowest channels.