



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

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.
- 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).
- 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.
- 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.
- 5) Please note that the original FCC ID is BQI01DT-4500, not BQI01DT-4500 (zero vs. O). Please correct for consistency throughout the report.
- 6) Please provide 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.
- 8) Page 9 and 11 appear to contain the same frequency list. Please explain.
- 9) Page 11 appears to list channel 0h, which doesn't exist. Please explain.
- 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.
- 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 was 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.
- 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.
- 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.
- 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.

Timothy R. Johnson
Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.