Compliance with 47 CFR 95.1125

> "*Portable devices as defined in §2.1093(b) of this chapter operating in the WMTS are subject to radio frequency radiation exposure requirements as specified in §§1.1307(b) and 2.1093 of this chapter. Applications for equipment authorization of WMTS devices must contain a statement confirming compliance with these requirements. Technical information showing the basis for this statement must be submitted to the Commission upon request.*"

The Model 96281 can be used less than 20 cm from the user. Therefore, the device can be considered a portable transmitter per 47 CFR 2.1093(b). The 608 – 614 MHz transmitter inside the Model 96281 uses two antennas. The maximum antenna gain is -4.2 dBi from the ceramic chip antenna. The maximum antenna gain from the ECG lead-wire antenna is 4 dBi. The conducted output power is split asymmetrically between the two antennas to approximately compensate the difference in gain. This is intended to provide diversity in respect to patient movement and posture. The maximum radiated field strength is 97.6 dBuV/m which is equal to a radiated output power of 1.7 mW EIRP.

The 608 – 614 MHz transmitter does not require routine SAR evaluation because it falls below the low power threshold of 60/f(GHz) mW. Please see this excerpt from KDB 447498D01 Mobile Portable RF Exposure v04, item 2)(a)(i):

> "A device may be used in portable exposure conditions with no restrictions on host platforms when either the source-based time-averaged output power is ≤ 60/f(GHz) mW or all measured 1-g SAR are < 0.4 W/kg."

The applicant's radio, FCC ID: CM6-670-1187-608, is compliant with the requirements of FCC 95.1125.

A certified Bluetooth radio module, FCC ID: CM6-WT12, will be co-located inside the device with the 608-614 MHz transmitter. The Bluetooth radio has a maximum antenna gain of 0.5 dBi, a maximum peak conducted output power of 2.1 mW, and a maximum peak radiated power of 2.36 mW (EIRP). It is also exempt from routine SAR evaluation.