# **TCB Compliance Opinion**

Revision 1/3/03

### Information about the Applicant

Company Name	Spacelabs Medical
Address	5250 220 <sup>th</sup> Ave. SE
City, State, Zip	Issaquah, WA 98027-7018
Requested By	Stan Wiley
Job Number	90341-5 WMTS Transmitter
Model	Spacelabs Medical
FCC ID	CM676A90341-WMTS
Agent	Northwest EMC, Inc.
Approval Type	Certification
Equipment Type	Licensed Non-Broadcast Transmitter Worn on Body
Rule Part	95H

## Overview

This application is for the Spacelabs Medical, Model 90341-05 Digital Telemetry Transmitter, FCC ID: CM676A90341-WMTS. It is a Licensed Non-Broadcast Transmitter Worn on Body, biomedical telemetry transmitter operating in the 608-614 MHz band.

The technical report and exhibits included with this application demonstrate compliance with FCC rules 47 CFR 95.1115.

### Recommendation

All items have been resolved and completed to my satisfaction; therefore I recommend this application for approval.

Dean Ghizzone, President

August 11, 2003

Date



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## **Findings and Resolution**

Item	The client has not submitted a signed contract.
Resolution	

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#### **Opinion**

Specification Requirements	Description
95.1125, 1.1307(b) & 2.1093	RF Exposure

**Opinion:** The Equipment meets the intent specified by the requirements listed above.

Discussion: 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 EUT is a body worn radio that is used to transmit patient telemetry. It can be considered a portable transmitter per 47 CFR 2.1093(b). A patient lead is used as the antenna.

Based upon a field strength measurement of 100.1 dBuV/m at 3 meters, the maximum peak power is 3.07 mW (EIRP). The transmit frequency is 608 to 614 MHz, therefore the EUT does not require routine SAR evaluation per "TCB Exclusions List", footnote 3 (dated July 17, 2002). See below:

The exposure category is "General Population". The distance is < 2.5 cm. Therefore the "Low Threshold" is 97.7 mW (EIRP) – above which routine SAR evaluation would be required. Since the maximum peak power of the EUT is 3.07 mW (EIRP), routine SAR evaluation is not required.

The applicant's radio, is compliant with the requirements of 95.1125.

Reference: RF Exposure Exhibit

Specification Requirements	Description
2.1049	Bandwidth

**Opinion:** The Equipment meets the intent specified by the requirements listed above.

**Discussion:** The Applicant has submitted test results in the form of a test report.

Reference: Technical Report

Specification Requirements	Description
95.1115(a)	Field Strength of the Fundamental

**Opinion:** The Equipment meets the intent specified by the requirements listed above.

**Discussion:** The Applicant has submitted test results in the form of a test report.

Reference: Technical Report

Specification Requirements	Description	
95.1115(b)	Undesired Emissions	

**Opinion:** The Equipment meets the intent specified by the requirements listed above.

**Discussion:** The Applicant has submitted test results in the form of a test report.

Reference: Technical Report

Specification Requirements	Description
95.1115(e)	Frequency Stability

**Opinion:** The Equipment meets the intent specified by the requirements listed above.

**Discussion:** The Applicant has submitted test results in the form of a test report.

Reference: Technical Report

Specification Requirements	Description
95.1115(c)	Emission Types

**Opinion:** The Equipment meets the intent specified by the requirements listed above.

Discussion: The Equipment is a medical telemetry device not used for video or voice.

Reference: Operation Description

Specification Requirements	Description
95.1123	Protection of Medical Equipment

**Opinion:** The Equipment meets the intent specified by the requirements listed above.

**Discussion:** The Applicant addresses this requirement in a warning section in the manual page 17-6.

Reference: User's Manual