

January 4, 2008

Federal Communications Commission  
Office of Engineering and Technology  
7435 Oakland Mills Road  
Columbia, Maryland 21046

Dear Sir or Madam:

The COGNIS 100-D/TELIGEN 100 models incorporate two co-located radios—an inductive telemetry radio and a radio frequency (RF) telemetry radio.

Concerning the inductive telemetry function of the COGNIS 100-D/TELIGEN 100 products, there is no requirement for SAR testing under Code of Federal Regulations (CFR) 47, Federal Communications Commission (FCC), Parts 15.209 and 2.1093. Furthermore, it would not be possible to violate the Commission's exposure limits due to the extremely low output power of the inductive radio.

Concerning the radio frequency (RF) telemetry function of the COGNIS 100-D/TELIGEN 100 products, these devices are operated in a manner that ensures the public is not exposed to the radio frequency energy levels in excess of the Commission's guidelines. These devices are categorically excluded from routine environmental evaluation. These devices operate under 47 CFR 15.249, and are therefore excluded from RF Exposure evaluation based upon 2.1091(c), 2.1093(c), and its low EIRP (<1mW).

Sincerely,



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