

FCC Laboratory  
7435 Oakland Mills Rd  
Columbia, MD 21045

Re: Questions related to Rule Sections 2.1046, 2.1047, 2.1049, 2.1051, 2.1053, 2.1055, and 2.1057 and the requirements therein. A question has been raised that compliance with the above rule sections as well as Part 95 rule sections for implants. Following is an excerpt from the correspondence regarding the matter.

Dear Mr. Harrington

Issue 6 of your review correspondence stated the following:

"6) EMC/radio report includes the following ambiguities and/or inapplicable indications.

a) pdf pg 7/47

"Testing Objective:

To meet the essential EMC and radio spectrum requirements according to Industry Canada standards."

b) pdf pg 1/47

"Report No. ... DRAFT"

c) pdf pg 2/47

"Certificate of Test

...

RSS-243:2010 ..."

Further to 2.1033(c)(14), please amend to explicitly show compliance for 2.1046 through 2.1057, AND 2.911(b) i.e. part 95 test data and information requirements.

[Incl: 2013 e-CFR 95.627(d), 95.627(e)(1), 95.627(g)(3), 95.633(e), 95.635(d)(1)(i), 95.635(d)(2), 95.635(d)(3), 95.635(d)(4), 95.639(f)(1) report EIRP data [95.627(g)(3)], 95.1209(b), 95.1209(c).."]

The following is provided to fulfill the request as written by the reviewing officer. Below is a cross reference from the above rule parts in 47CFR Part 2 to those portions of the FCC Test Report from Northwest EMC that show compliance with the requirements of each of the referenced Part 2 rule sections.

Part 2 rule section	Technical Parameter	Part 95 Test Report Item and page no. that addresses applicable Part 2 requirements
2.1046	RF Power Output	Field Strength of Fundamental, p.14-15. A calculation of the radiated power was made using the maximum measured field strength. This produced a power level of 82.2 nWatts after accounting for the reflected component (6dB). Section 95.639(f)(1)
2.1047	Modulation Characteristic	Part 2 references info covered by Part 95.633(e)(3), p.30-33
2.1049	Occupied Bandwidth	Part 95 has no requirement for measuring occupied bandwidth. However, this information is presented on p. 30-33
2.1051	Spurious emissions at ant. terminal	The EUT has a built in antenna that is not accessible. Also the Part 95 rules only have limits in terms of radiated field strength. See the following sections.
2.1053	Field strength of spurious radiation	Spurious transmitter emissions according to Section 95.635, p.34-36
2.1055	Frequency stability	Part 95.628(e) specifies the frequency stability requirements of MedRadio transmitters. Pages 16-29 of the test report contain the specific info.
2.1057	Frequency spectrum to investigate—requires up to the 10 <sup>th</sup> harmonic. Emissions more than 20 dB below the limit need not be reported.	The files on p.34-36 show spectral plots from 10 MHz to 5 GHz covering all emissions emanating from the device from the lowest RF frequency generated to the 10 <sup>th</sup> harmonic. Noting that emissions more than 40 dB below the limit were measured and reported the requirement has been met.

Regards,

Phillip Inglis (signed)

Phillip Inglis

Authorized agent for Medtronic