

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 rules for implants. Following is an excerpt from the correspondence regarding the matter.

Dear Mr. Harrington

Issue 12 of your correspondence stated the following:

“12) EMC report has identified several part 95 rules sections used for compliance demonstration; note also that 2.1033(c)(14) requires demonstrating compliance for 2.1046 to 2.1057. Per 2.911(b), compliance must be documented for both 2.1033(c)(14) and part 95; please revise EMC report accordingly.”

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.21-24. In item 11 of the Commission correspondence a calculation was requested of the radiated power. Using the maximum measured field strength, a power level of 110.9 nWatts was computed. Section 95.628(g)(3)
2.1047	Modulation Characteristic	Part 2 references info covered by Part 95.633(e)(3), p.36-46
2.1049	Occupied Bandwidth	Part 95 has no requirement for measuring occupied bandwidth. However, this information is presented on p. 25-35
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 section.
2.1053	Field strength of spurious radiation	Spurious transmitter emissions according to Section 95.635, p.67-70
2.1055	Frequency stability	Part 95.628(e) specifies the frequency stability requirements of MedRadio transmitters. Pages 47-62 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.67-70 show spectral plots from 10 MHz to 10 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.