

December 17, 1998

Chief, Equipment Authorization Branch,
Authorization and Evaluation Division,
Office of Engineering and Technology
FEDERAL COMMUNICATIONS COMMISSION
P.O. Box 358315
Pittsburgh, PA 15251-5315

## Gentlemen:

The enclosed documents constitute a formal submittal and application for a Grant of Equipment Authorization pursuant to Subpart C of Part 15 of FCC Rules (CFR 47) regarding intentional radiators. Data within this report demonstrates that the equipment tested complies with the FCC limits for intentional radiators.

This submittal was prepared by Eiliott Laboratories, as duly authorized agent. A copy of the letter of our appointment as agent is enclosed. Please also find enclosed a check in the amount of \$1075.00 for the application fee and request for confidentiality.

If there are any questions or if further information is needed, please contact Elliott Laboratories for assistance.

Sincerely,

Mark Briggs

Manager, EMC Consulting Services

MB/bab

Enclosures:

Application Fee FCC Form 159

FCC Form 731

Request for Confidentiality Agent Authorization Letter

Emissions Test Report with Exhibits



701 East Evelyn Avenue Sunnyvale, CA 94086-6527 800 733-3455 408 238-4803 408 235-8750 Fax

December 15, 1998

Federal Communications Commission 7435 Oakland Mills Road Columbia, MD 21046

Subject: Agent Authorization

## Gentlemen,

This is your letter of authorization to accept our appointment of Elliott Laboratories, Inc. as Agent for St. Jude Medical CRMD, 701 E.Evelyn Ave. Sunnyvale, CA. 94086, to sign applications before the commission and to make representations to you on our behalf. Elliott Laboratories is to receive and exchange information between our company and the Commission. This authorization is made pursuant to Section 2.911(c) of the FCC Rules and expires on August 1,1999.

Sincerely,

Eric Fain

Vice President

Clinical Engineering &

Regulatory Affairs



701 East Evelyn Avenue Sunnyvale, CA 94086-6527 800 233-3453 408 736-4893 408 735-8750 Fax

Federal Communications Commission Equipment Authorization Branch 7435 Oakland Mills Road Columbia, MD 21046

December 15, 1998.

To Whom It May Concern:

I am writing to avoid the possibility of an inadvertent disclosure of proprietary information.

The accompanying Form 731 is being filed with the commission on our behalf by Elliott Laboratories, Inc. a consulting and testing laboratory. Included as an exhibit with the enclosed application are block diagrams, schematic diagrams, a detailed description of the theory of operation and the photographs requested in Form 731.

It is our intention to provide the commission with a full disclosure of our process so that its media can be evaluated fully. Indeed, we are pleased to provide any further information that the commission might wish to see. It is not our intention, however, to make our proprietary process a matter of public record.

In view of the fact that the block diagrams and associated theory of operation disclose the mechanism of our process, we ask that finese portions (block diagrams, schematic diagrams and theory of operation) of our application be withheld from public inspection as provided under FCC section 0.459. These diagrams contain details of the operation of circuitry which is partially embedded in complex medical devices. These details are not readily discernable – even to technically sophisticated individuals- from our hardware and constitute trade secrets.

We request that these documents and this letter be segregated from the body of our evaluation report and withheld from public inspection.

Thank you for your attention. Please let the undersigned know if the Commission disagrees with our position or requires further justification.

Sincerely,

Eric Fain

Vice President

Clinical Engineering &

Regulatory Affairs

St. Jude Medical CRMD