

Philips Medical Systems

To: Federal Communications Commission, Washington, DC 20554
Attention: Mr. Tim Harrington
Date: February 9, 2007
From: Barry Wyshogrod, Philips Medical Systems, Andover, MA
Subject: **Reply to Correspondence References 32264, 32265, 32266, 32267
731 Application #EA839822 (PQC-4851)**

Dear Mr. Harrington and FCC Reviewers,

On 21-Dec-06, you e-mailed me the following questions/requests:

Issue 1:

RF exposure exhibit says source-based time-averaged output is less than 1 mW - if not in filing already, please provide details how this power is derived, and provide details about how duty factor is established by device.

Issue 2:

This application was filed under Eqpt Class TNT and rule part 90, however test report indicates compliance with 15.249 which is Eqpt Class DXX. FYI we will change from TNT to DXX, and in accordance with channels tested will list freqs 2401.056-2482.272.

Issue 3:

If not in filing already, please provide info about 15.19, 15.101 compliance.

Issue 4:

If not in filing already, please provide info about device antenna, in accordance with 2.1033(b)(4), 2.1033(b)(7).

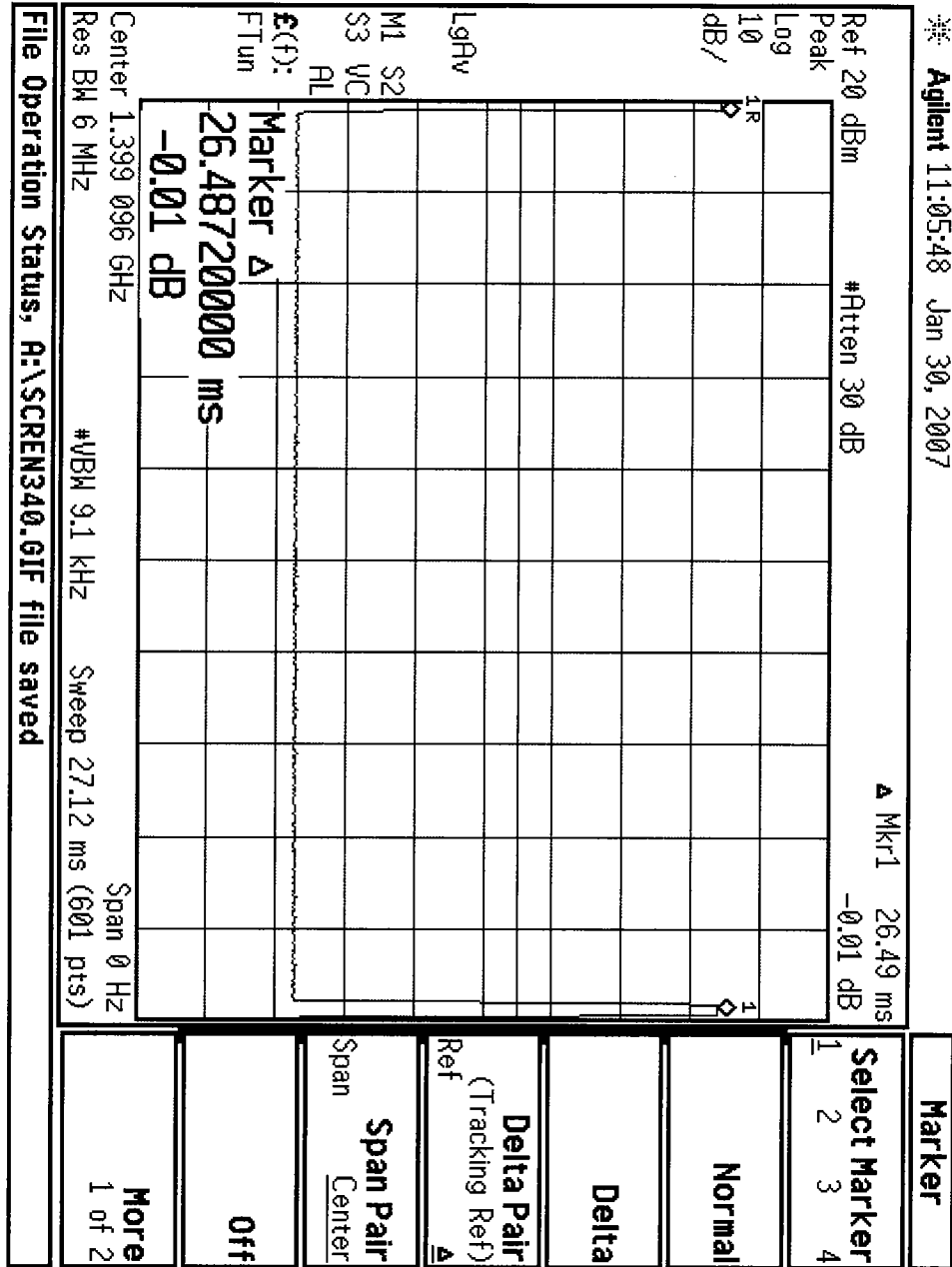
Philips Medical Systems' response:

Issue 1:

The PQC-4851 device is not transmitting all the time; rather it transmits for only 416 microseconds in each 26 millisecond period. This equates to a duty cycle of 1.6%. During the time that the device is transmitting, its peak radiated power emanating from the antenna is 32 milliwatts. 32 milliwatts with a duty cycle of 1.6% translates to an average power of 0.5 milliwatts. Therefore, the average time-based power output of this device is 0.5 milliwatts.

The following screen capture depicts the relative timing of the radio output of the device, as described above.





Issue 2:

The change from classification TNT to DXX is acceptable to Philips.
 The frequency range of 2401.056 - 2482.272 MHz is acceptable to Philips.

Issue 3:

15.19 Compliance:

As per 15.19(a)(1), the Instruction Manual prominently displays the following statement "This device complies with part 15 of the FCC Rules. Operation is subject to the condition that this device does not cause harmful interference."

Furthermore, our FCC Declaration of Conformity states that:

"...the receiver portion of this transceiver device is in conformity with Part 15 of the 47 CFR FCC Rules. Operation is subject to the following two conditions:

- (1) This device may not cause harmful radio interference, and,
- (2) This device must accept any radio interference received, including interference that may cause undesired operation."

As per 15.19(a)(5), the above statements do not appear on the device, but rather in the Instruction Manual and Declaration of Conformity. The device is small, and has a lot of important clinical labeling. To minimize the visual clutter and confusion associated with too many labels, these FCC statements are not imprinted on the device, but are included in the documentation listed above.

The above two clauses are deemed to be the only requirements of 15.19 which are applicable to the device.

15.101 Compliance:

As per 15.101(a), the receiver portion of this transceiver device complies with part 15, in the category of "All other receivers subject to part 15". Philips Medical Systems has a Declaration of Conformity associated with this claim.

This item is deemed to be the only clause of 15.101 that is applicable to the device.

Issue 4:

The requirement of 2.1033(b)(4), to provide a brief description of the circuit functions and the operation of the device, was addressed in the initial submission of 21-Nov-06, under the "Operational Description" attachment. Further, schematics and bill of material were also attached to the on-line submission. The antenna is an integral monopole of 50 ohm impedance.

The requirement of 2.1033(b)(7), to provide photographs of the exterior, construction, and labeling, was addressed in the initial submission of 21-Nov-06, under the "External Photos", "Internal Photos", and "ID Label/Location Info" attachments. In addition, I am hereby attaching better quality and more detailed photos of the device, as new, additional "External Photos" and "Internal Photos" attachments. The internal photos display the antenna.

Thank you in advance for your continued consideration of our application. For any further issues, I can be reached at (978) 659-7383 or by e-mail to: barry.wyshogrod@philips.com. If I am not available, please contact Ms. Zety Billard at (978) 659-3603 or by e-mail to: zety.billard@philips.com.

Sincerely yours,



Barry Wyshogrod
Regulatory Engineer