

Philips Medical Systems

To: Federal Communications Commission, Washington, DC 20554
Attention: Ms. Diane Poole
Date: April 15, 2005
From: Barry Wyshogrod, Philips Medical Systems, Andover, MA
Subject: **Reply to Correspondence Reference #28770**
731 Application #EA675292

Dear Ms. Poole and FCC Reviewers,

Today, 15-Apr-05, you e-mailed me the following observations/requests:

1) FYI no-response/no-action required: cover letter refers to FCC DA 00-1407 - that document is applicable only for Part 15 devices and is not applicable for this Part 95 device.

2) FYI no-response/no-action required: This application was filed using e-filing Equipment Class TNB - Licensed Non-Broadcast Station Transmitter. Cover letter states "to be incorporated into certain Philips patient monitors." This implies device will normally be used at distances closer than 20 cm from a person's body. Therefore we will change Equipment Class to TNT - Licensed Non-Broadcast Worn on Body.

3) Further to 2), WMTS portable devices are subject to RF exposure routine evaluation - please address 2.1093(c).

4) Cover letter states device will be used in patient monitors. Per 47 CFR 2.1093 95H devices operating in portable exposure conditions are subject to RF exposure routine evaluation. Please submit RF exposure compliance info.

Philips Medical Systems' response:

Item (1): No-response/ No-action required.

Item (2): For the clinical application intended in this submission, the patient monitors are located more than 20 cm away from the patient's body. Typical distances range from 3-10 feet (~90-300 cm). This is especially important because most patient monitors are line powered (120 vac), and therefore are located outside the patient's vicinity with their associated power cord connection. Philips Medical Systems asserts that the initial classification of "TNB" is the appropriate choice.

Items (3) and (4): Further to our response to item (2), given that the radio module is located significantly farther away from the patient than 20 cm, Philips Medical Systems asserts that the device is exempt from the RF exposure evaluation as per 47 CFR 2.1093(b).

Thank you for your continued consideration of our application. For follow-up and 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. Denise Haley at (978) 659-4358.

Sincerely yours,

Barry Wyshogrod
Barry Wyshogrod
Regulatory Engineer

