

Philips Medical Systems



To: Federal Communications Commission, Washington, DC 20554  
Attention: Ms. Diane Poole  
Date: October 28, 2004  
From: Barry Wyshogrod, Philips Medical Systems, Andover, MA  
Subject: **Reply to Correspondence Reference #27861**  
**731 Application #EA237745**

Dear Ms. Poole and FCC Reviewers,

On 25-Oct-04, you e-mailed me the following requests:

1. Please add the FCC statement on the label as in 15.19 (a) of the FCC rules to the product.
2. Please submit a revised Confidentiality letter (for short term and long term confidential).

Philips Medical Systems' response to Item #1 above:

Diane, as you and I clarified in our phone conversation, the radio portion of the PQCM2601B device does not contain any radio receiver; it is a transmitter only. And given that the remainder of the device is a specialized medical digital device, it is exempt from bearing the 47 CFR Part 15.19(a) label. Therefore, as we agreed by phone, the device will not bear this FCC statement.

That said, I hereby attach a revised FCC ID Label for your records. Please delete all previous ID Label attachments and use this one (I had previously submitted a label as part of our reply to Correspondence #27587 on 22-Sep-04). Philips Medical Systems understands and agrees that this new FCC ID Label will not be held confidential.

Philips Medical Systems' response to Item #2 above:

Philips is no longer requesting Confidentiality for the FCC ID Label mentioned above. However, as discussed in my phone conversations with you, Diane, Philips Medical Systems hereby submits a revised Request for Confidentiality, which supersedes our previous request dated 30-Aug-04.

The new Request for Confidentiality distinguishes between Indefinite Confidentiality and 45-day Limited Confidentiality, and itemizes our request for the appropriate type for specific attachments to our submission. Indefinite Confidentiality is important to protect Trade Secrets. Limited Confidentiality is important for Philips Medical Systems from a commercial perspective. It enables the company to complete its development and regulatory efforts prior to introducing the product to the marketplace. Releasing information on the product via the FCC website prior to formal market introduction can be confusing to our customers and to the medical community, and places the company at a competitive disadvantage.

Therefore, I hereby attach two new attachments to our EA237745 submission:

1. Revised FCC ID label artwork for PQCM2601B.
2. Revised Request for Confidentiality.

Diane, thank you for your help and guidance. For any further issues, I can be reached at **(978) 659-7383** or by e-mail to: [barry.wyshogrod@philips.com](mailto:barry.wyshogrod@philips.com). If I am not available, please contact

Ms. Denise Haley at **(978) 659-4358** or by e-mail to: [denise.haley@philips.com](mailto:denise.haley@philips.com).

Sincerely yours,

Barry Wyshogrod, Regulatory Engineer  
*Signature already on-file at the FCC*