

06 May 2008

American TCB
6731 Whittier Avenue
McLean VA 22101

RE: Nonin Medical Inc
Response to 4-29-08 Comments

FCC ID: RG9SABER

In response to your comments on the above submittal.

1. ATCB Comments: For FCC the agency letter and confidentiality letter should be signed by someone traceable to have the proper authority. For instance, the FCC site shows Samuel Foos as the correct contact of authority for FCC matters. Therefore the agency letters should be signed by this contact or alternatively a letter showing who he has "deputized" (i.e. Harold Rudnick) to sign on his behalf may be provided as well.

RESPONSE: FCC Grantee Code contact has been updated to Harold Rudnick.

2. ATCB Comments: FYI...We have a pending inquiry with the FCC regarding the Shielding of this device. We will provide details once they are available. It may be that this will need to be done as a limited modular approval subject to certain restrictions. More information will come shortly.

RESPONSE: Nonin has decided to apply as a Limited Modular Approval. The LMA letter has been uploaded describing how they will control within their own equipment and control compliance of each model the device will be going into.

3. ATCB Comments: The information regarding manual appears to only address a 2 items. The FCC expects usually expects complete guidance regarding aspects that may affect compliance, labeling, etc.. This would include more items such as the attached on the following pages (as an example). Please update.

RESPONSE: Covered in LMA letter.

4. ATCB Comments: The test photographs do not appear to show the device clearly and is not exactly what is expected given the internal photos provided. Please provide additional photos as necessary to show how it was tested and show compliance with the tested stand-alone requirement.

RESPONSE: Four test fixture photos have been uploaded separately to the application.

5. ATCB Comments: Regarding regulation, it is cited that U201 and batteries are used. First, unless specifically provided with battery connections, use of battery cannot be assured by all integrators. Additionally, U201 was not located in the schematics to show regulation for modular requirements. Please explain.

RESPONSE: From the client: Batteries will not always be used. Batteries were used for the radiated emissions testing. We will be testing conducted emissions. U201 is located on page 3 of the schematic, the part number is LTC3530.

6. ATCB Comments: Since this is modular and use of the batteries cannot be assured without appropriate battery connections (see attached for more info), please provide AC powerline conducted results.

RESPONSE: Revised test report with AC powerline conducted emissions data included has been uploaded.

7. ATCB Comments: Model listed for IC is Saber while the label cites SABER. Please confirm which way it should be listed.

RESPONSE: Revised application has been uploaded – the correct listing is SABER.

8. ATCB Comments: Please provide appropriate RSS-102 Attestation. Please note that under IC requirements, anything greater than 20 mW requires SAR for a portable device. It may be that this module will require limiting to mobile devices. Please address.

RESPONSE: The ASS-102 attestation has been uploaded. I e-mailed you separately regarding the SAR issue.

9. ATCB Comments: Banded measurements show compliance to the 20 dB down requirement. However it does not appear that the 54/74 avg/pk radiated requirements have been shown. Please show/explain compliance as necessary.

RESPONSE: Revised test report has been uploaded.

10. ATCB Comments: For IC the emission designator for BT is commonly FXD or G1D. Please review.

RESPONSE: Revised application has been uploaded.

11. ATCB Comments: IC also requires RX emissions to be reported. Please review.

RESPONSE: Revised test report has been uploaded.

Please let us know if anything further is required.

Susan L Rupp

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