

21 May 2008

American TCB
6731 Whittier Avenue
McLean VA 22101

RE: Nonin Medical Inc
Response to 5-15-08 Comments

FCC ID: RG9SABER

In response to your comments on the above submittal.

1. While LMA is possible without a shield in place, the applicant must understand that final compliance installed in hosts is dependent on the host as well. This is due to the fact that the shielding affects both emissions and immunity. Therefore despite approval under an LMA, the manufacturer is responsible to retest the TX spurious emissions for each host since the affect of not having a shield now makes the device host dependent. Please acknowledge the manufacturer understands this limitation.

RESPONSE: Acknowledgement letter uploaded.

2. It does not appear that the antenna gain (for either antenna if 2 are being submitted) was addressed in the application. FCC and IC require that worst case of conducted or EIRP be considered for the RF exposure. Please explain. Additionally, it would be a good idea to provide the same RF exposure letter just provided for the FCC as well

RESPONSE: FCC SAR letter uploaded..

3. It appears that 2 antennas may be submitted in this application – how internal photographs appear to only show one. Please provide information or photos to properly document both antennas.

RESPONSE: Nonin abandoned the second design (flex circuit antenna), as it was proven to have no advantage in performance or cost. .

4. Are the new AC powerline emissions photos in the report correct. This appears to be a different device.

RESPONSE: The module is dc powered, so in order to perform conducted ac power line emissions, one of the end products that the module is going to be used in was used to demonstrate ac powerline conducted emission compliance..

5. Please update the separate test photograph exhibit to add appropriate AC powerline emissions photos.

RESPONSE: Revised exhibit has been uploaded.

6. Given review of the changes to the test report (revision page) and the report – it is uncertain where RX emissions information was added. Please explain.

RESPONSE: Revised test report has been uploaded.

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Please let us know if anything further is required.

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