



February 12, 2009

Federal Communications commission  
7435 Oakland Mills Rd.  
Columbia, MD 21036

**Re: Application for Class II Permissive change for FCC ID RIASJMRF**

In response to your questions, please see the following responses from St. Jude Medical:

**1) where not in filing already, please explain phantom liquid top and bottom surface heights above ground plane, and implant height above ground**

**SJM Response:**

The implant height above ground plane is 1.5 m. The implant is centered vertically in the liquid, which has a height of 76 cm, within the phantom cylinder of 79 cm height.

Note: A minor dimensional deviation was identified for the phantom used in Test report 816799-1. The additional testing required in question 2) below, as well as a re-run of the already reported test data, was performed using the corrected phantom, see the revised Test report 901056-1.

**2) because this is antenna change for device with fundamental-signal rating in terms of EIRP, fundamental signal EIRP results are needed herein; this filing appears to report 403 MHz field strength for QP/AV 120 kHz BW, which is not in accordance with 95.635(f)(1) & (3) - please explain and/or revise**

Additional testing according to §95.639(f) (1) & (3) – "Maximum transmitter power", has been performed. Please see the revised Test report 901056-1.

**3) we noticed Form-731 power listing for original filing under this FCCID seems incorrect; specifically measured field strength was reported therein as 63.2 dBuV/m = 0.0000063 W EIRP; in reply here please concur for us to correct original grant, and along with question 2) please ensure present changes comply with 2.1043**

The original grant should be corrected to report the specifically measured field strength as 63.2 dBuV/m which corresponds to 0.157  $\mu$ W EIRP.

**4) SAR report mentions P1528.1, but also biblio. citation and date is needed please**

IEEE P1528.1/D1.0 sec 5.1.cited on page 4 of the SAR report 50029813 rev A refers to an internal report of Computer Simulation Technology (CST), the company providing the simulation software used. This reference is removed in the updated SAR report 50029813 rev B. The averaging is conformal to IEEE C95.3.

**5) if not in filing already, please describe actual antenna/wire structure dimensions, and mesh and modeling scheme, eg number of cells in wire cross-section, etc. please include close-in view(s) of feed-region and antenna geometry as feasible.**

Please refer to clause 4.5 of the SAR report for the mesh and modeling scheme. For the header type represented by Current DR RF for example, see table 4. The Mesh cell size was varied automatically by the software from a maximum of 0.11 inch to a lower limit of 0.0040 inch. For the other two header types Current VR RF and Promote RF, see tables 5 and 6.

Mesh size was automatically adjusted downward for object detail. The total number of cells was manually varied in three steps. For the header type represented by Current DR RF for example, it was varied from 3 348 180 up to 4 399 104 mesh cells to assess the result on computed SAR (see table 4), which varied less than 0.00005W/kg.

Please see updated SAR report 50029813 rev B, figure 2-10 for close-in views of the antenna region.

If there are any questions please feel free to contact me at 408 738 4883 ext. 6494.

Sincerely,



Elisabeth E. Neely  
Regulatory Affairs  
St. Jude Medical