MASIMO®
40 Parker
Irvine, CA 92618
Tel: 949-297-7000
Fax: 949-297-7001

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Dear Application Examiner:

Masimo Corporation is submitting this application for the certification of their model Radical 7R Pulse CO-Oximeter, FCC ID:VKF-RAD7CPL. It is a LCD based display, standalone pulse CO-Oximeter. It contains a radio interface to allow wireless connection to Patient Safety Net and other wireless systems. The radio operates in the 2.4 and 5.8 GHz bands as a DTS device and in the 5.2 GHz band as a UNII device.

The model Radical 7R Pulse CO-oximeter also contains a previously certified Bluetooth radio module FCC ID: PVH0925. The two radios can transmit simultaneously. The MPE estimates demonstrate compliance of the co-located radios with the applicable RF safety requirements. The Bluetooth radio module will always be installed with the WiFi radio in the CO-oximeter.

The software will send data via the radio when the data is made available to the radio by the device on an as needed basis; therefore there is no scheduled broadcast in the absence of data other than control signals per FCC rules 15.407(c).

FCC ID: VKF-RAD7CPL utilizes internal antennas that are not user accessible. This configuration satisfies the requirements of 47 CFR 15.203.

The digital portion is exempt from FCC Part 15B requirements because it is a medical device.

The technical reports and exhibits demonstrate compliance with FCC rules 47 CFR 15.247 as a DTS device and 47 CFR 15E as a UNII device. The various EMC test reports are applied as follows:

- Spurious Radiated Emissions and AC Powerline Conducted as a DTS device: Northwest EMC Test Report # MASI0057
- Spurious Radiated Emissions and AC Powerline Conducted as a UNII device: Northwest EMC Test Report # MASI0057.2
- Antenna Port Direct Connect data as a DTS device: Northwest EMC Test Report # MASI0009
- Antenna Port Direct Connect data as a UNII device: Northwest EMC Test Report # MASI0009.1

Your efforts in reviewing this application are greatly appreciated.

Best regards,

David Mosley