



RESEARCH, LTD.

ALCON RESEARCH, LIMITED
15800 ALTON PARKWAY
P.O. BOX 19587
IRVINE, CA 92623-9587
(949) 753-1393

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Federal Communication Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, Maryland 21046

Dear Application Examiner:

Alcon Research's RFID radio is seeking a system approval under the FCC ID: VMC212-1. The RFID radios will be installed in Alcon's Constellation Vision System. The radio meets the requirements for system approval as detailed in FCC Public Notice DA00-1407. Compliance or non-compliance to each of the requirements is described below:

1. **"The modular transmitter must have its own RF shielding."** The radio does not have its own RF shielding; and cannot therefore be approved for full modular approval. Alcon is seeking a system approval of the RFID radio. Please see the Internal Photos exhibit.
2. **"The modular transmitter must have buffered modulation/data inputs."** The transmitter has buffered inputs at the RFID readers and processors.
3. **"The modular transmitter must have its own power supply regulation."** The IC contains its own voltage regulation.
4. **"The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c)."** The EUT meets the FCC antenna requirements. Please see Antenna information exhibit and internal photos exhibit.
5. **"The modular transmitter must be tested in a stand-alone configuration."** The EUT was not tested in a stand-alone configuration. The radio was tested while installed in the Constellation Vision System. Therefore, the radio does not comply with the requirements for full modular approval. Thus, Alcon is seeking a system approval.
6. **"The modular transmitter must be labeled with its own FCC ID number."** The Constellation Vision System will be labeled with its own FCC ID number. Please see the FCC ID label & location exhibit.
7. **"The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide**

adequate instructions along with the module to explain any such requirements.”

The EUT is compliant with all applicable FCC rules. Detailed instructions for maintaining compliance, including all applicable FCC warnings, are available in the Constellation Vision System user manual.

8. **“The modular transmitter must comply with any applicable RF exposure requirements.”** The EUT is compliant with all applicable RF exposure requirements. Devices under rule part 15.225 are exempt from routine RF exposure evaluation.

Please contact us if you have additional questions. Your attention to this matter is greatly appreciated.

Best regards,

A handwritten signature in black ink, appearing to read 'D. Modi', with a stylized flourish at the end.

Dharmesh A. Modi
Assoc. Director Product Certification/ Regulatory Affairs
Tel: 949-753-6763, Fax: 949-753-6250
dan.modi@alconlabs.com