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September 1, 2011

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

Re: Correspondence Reference Number: 40144; 8/4/2011
731 Conformation Number: EA439873

Subject: Item 4; Medical Implant EIRP Measurements.

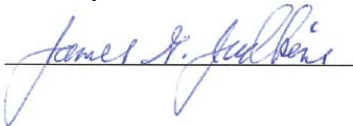
4.) Section 95.628(g)(3)(i). The FCC will accept radiated measurements performed without a body simulator for this specific application filing. However, confirmation that operation of the device at the authorized power level has been validated in situ, in the form of an attestation or test results, is requested. Please be reminded that any post-grant transmit power increase would require a new FCC ID.

The Spinal Modulation medical implant MN0200 EIRP has been verified in-situ. We have determined that testing in air is the worst case and the MN0200 EIRP is approximately 10 dB higher in air than in human body simulator. The testing at Nemko further verified the MN0200 will be in FCC compliance when operated in air on some special occasions.

- Functional checks prior to shipping.
- Pre-surgical functional checks prior to patient preparation.
- Functional checks during patient surgery prior to final implant and surgical closing.

The compliance testing at Nemko was in air and maximum possible power. Therefore, there will be no post-grant request for transmit power increase.

Sincerely,



Jim Judkins
Principal Engineer
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