From: Joe Dichoso [mailto:Joe.Dichoso@fcc.gov]
Sent: Tuesday, December 14, 2010 8:55 AM
To: Shannon Krause; Raymond Laforge; David Galosky; Rashmi Doshi; Joe Dichoso; Jim Szeliga
Cc: marina@ultraclenz.com; Brad Cole; Ric Ogden
Subject: KDB 796294, RE: Equipment Approval RE: Ultraclenz

Hello Charlie,
We have agreement that hospital hand cleansing is a “safety” application under 15.231(a)3 but please note that it is not a “safety of life” alarm condition under 15.231(a)4. Also note that there are different transmission requirements under 15.231(a)3 and 15.231(a)4.
Regards,
Joe

From: Charles C. Johnston [mailto:ccjvt@ventextech.com] **On Behalf Of** Shannon Krause
Sent: Thursday, December 09, 2010 1:38 PM
To: Joe Dichoso
Cc: marina@ultraclenz.com; 'Brad Cole'; 'Ric Ogden'
Subject: Equipment Approval RE: Ultraclenz

Mr. Dichoso,

I appreciate your attention to this matter. For your reference the tracking number is 796294.

The equipment, as part of a safety system, is designed for hospitals to prevent the spread of germs and toxics by hand contamination. Government statistics indicate that approximately 300,000 patients die each year by the spread of bacteria due to inadequate hand hygiene – failure to wash or sanitize hands while coming in contact with patients.

As discussed:

We are preparing for certification testing of a product that we have developed and want to verify that its operation would fall under Section 15.231, paragraph (a). The product is used to protect the health and safety of healthcare workers and patients by reducing the spread of communicable diseases through hand contact . The product monitors the activation of hand cleansing stations to ensure compliance with corporate or government hand sanitization policies.

Background
Highly infectious communicable diseases transmitted through direct contact, propagated from patient to patient by contact with healthcare workers who are unwitting carriers are a serious problem in healthcare facilities . In the most serious cases this bacteria can be flesh-eating and resistant to antibiotics. The most effective approach to

managing this is killing the bacteria on carriers before it can be exposed to the patient. Facilities have instituted hand sanitization policies to respond to this, but its effectiveness today relies on voluntary compliance. Improved performance requires that compliance be verified and enforced on a REAL TIME basis.

Description of Product
Hand sanitization stations are typically located throughout a healthcare facility. The product we have developed would add a 433.92MHz radio to each station (Tag) so that it can communicate its activity. The Tag transmits a message to a receiving Hub when the hand sanitizer is manually activated. The messages received by the Hub control an alarm when the usage characteristics of the dispenser are not consistent with the policies of the organization, such as when a person enters a room but does not clean his hands within a certain period of time. Since the product is manually activated and controls an alarm based on that activation, we believe it satisfies the requirements described in 15.231 paragraph (a).

The intended recipient of the message from the Tag may not be the nearest Hub, so the message may need to be relayed to another Hub one or more hops away. Therefore, each Hub needs to know what other devices are nearby with which it can communicate. To determine this, the system occasionally polls to determine what nodes are within range of the radio. Since this product protects patients from injury by protecting them from being exposed to potentially harmful bacteria, we believe it satisfies the requirement in paragraph 15.231(a)(3) as a product "used in security or safety applications."

The operation of the product complies with the technical performance described in paragraphs 15.231(b) and 15.231(c).

Again, I thank you for your attention to this matter and any help you may provide. If there are any questions please do not hesitate to contact me.

Very Truly Yours,

Charles Johnston
CEO
Ultraclenz, LLC

Charles C. Johnston
1440 W. Indiantown Road
Suite 350
Jupiter, FL 33458

Tel: 561-354-6300
Fax: 561-354-6301
Email: charlesj@ventextech.com