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Memo

To: Memo to FCC File
From: Brett B. Bonner
CC: Tim Stever, Eric Brown, Dan Mihai
Date: 1/18/2012
Re: X-Series Communications Processor 15.407(c) compliance

This is ZOLL's attestation as to compliance with FCC 15.407(c) for the Communications Processor of the X-Series device.

FCC 15.407(c) requires that "The device shall automatically discontinue transmission in case of either absence of information to transmit or operational failure. These provisions are not intended to preclude the transmission of control or signalling information or the use of repetitive codes used by certain digital technologies to complete frame or burst intervals."

The X-Series Communications Processor may maintain an association with a base station (WiFi access point) during normal operation. In the absence of any active data transfer as described below, transmission activity is limited to the control and signaling as required by the IEEE 802.11 wireless standard, and related connection maintenance activity such as the periodic renewal of IP address leases via DHCP (if so configured).

Active data transfer/transmission is limited to the following circumstances:

- Transmission of data to a remote server will occur when requested by user action on the device.
- Transmission of data on the local wireless LAN will occur as a result of requests by other devices/clients on that LAN. This might include service discovery, name resolution, service requests, or similar types of activity.

In the event of operational failure of the Communications Processor, the X-Series "Main Processor" will detect the failed condition. This will trigger an automatic process of attempting to reset the Communications Processor to restore normal operation. If the reset process fails to correct the operational failure, then power to the Communications Processor will be disabled, ensuring that no transmission activity can occur.

Brett B. Bonner
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