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October 10, 2017

Gregory Czumak
American Certification Body Inc.
6731 Whittier Ave
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RE: Comments of August 29, 2017
APPLICATION: Nalu Medical Inc
FCC ID: 2AMB3-34001-001

If the BLE module and the DXT transmitter are capable of simultaneous transmission (see comment 5, above), please confirm that the BLE was on and transmitting (in normal operation) when spurious radiated emission measurements were performed on the DXT, per Section 15.31(h).

R. Yes, the BLE module is capable of transmitting simultaneously. Evaluation was done with both units transmitting.

Page 14 of the revised test report states that to "demonstrate part 15 compliance of data transfer, a test is used that emulates the removal of the spectrum due to power transfer" – please provide some additional information about this test (just a sentence or two) – does it involve modifications to the hardware? Or, is it just a software correction? Is it similar to the [trace A – trace B] function available on many spectrum analyzers? Please clarify, either in the report itself, or in a response document.
R. Per the Operational Description exhibit " The Nalu ETM transfers data to the implant by modulating the power carrier with low-depth amplitude modulation. The power transfer spectrum that is compliant with Part 18 is not necessarily consisten with Part 15, and so combined power and data transfer requires special consideration. To verify that the spectrum of data transfer is compliant with Part 15, tests are performed that emulate the removal of the power transfer spectrum. This test sets the amplifier at its minimum supply voltage of 0.6V, and demonstrates a combined power and data spectrum that is compliant with Part 15 – even though the largest emissions in this test are due to the transfer of power. "

If the 8CC portion of this device is going to be authorized under DoC, please confirm that the DoC logo will be added to the label, in addition to the FCC ID number, as required.
R. Applicant has been notify.