



Glucose Instrument R&D, Dept. 6920
18000 Devonshire Street
Northridge, CA 91325-1219

February 6, 2009

TCB
CKC Laboratories, Inc.
5046 Sierra Pines Drive
Mariposa, CA 95338

Dear Sir or Madam:

Per 47 CFR § 2.1093 (c), the Medtronic Minimed MySentry Monitor Model MMT9101 and MySentry Outpost Model MMT9102 are categorically excluded from routine environmental evaluation for RF exposure prior to authorization or use, since the products are mobile devices authorized via 47 CFR § 15.249 and 47 CFR § 15.247.

We do realize that the Federal Communications Commission may request additional SAR or MPE information under 47 CFR § 1.1307 (c) or (d), and offer the following calculations to demonstrate that the MMT9101 and MMT9102 are well under the Part 2 and OET 65 limits.

Both the MMT9101 and MMT9102 are mobile devices normally used at greater than 20 cm from a human body. Furthermore the Instructions For Use instruct the user to keep the devices greater than 20 cm away, except for the hands. Thus the MPE limits apply rather than SAR. And since our user must be in the general vicinity of our devices during use, the lower level "Uncontrolled" limits are used.

Per § 1.1310 Table 1

MPE Limit for General Population/Uncontrolled Exposure, S: 0.611 mW/cm² @ 916.5 MHz
1.0 mW/cm² @ 2.4 GHz

MMT9101 and MMT9102 Transmitter Power, P: 0dBm (1mW) @ 916.5 MHz
64.6 mW @ 2.4 GHz

Antenna Numeric Gain, G: 1.62

Minimum Use Radius, R: 20 cm

$$S = \frac{PG}{4\pi R^2} \quad S(\text{total}) = S(@916\text{MHz}) + S(@2.4\text{GHz}) \\ = 0.000322 + 0.02082 = 0.0211 \text{ mW/cm}^2$$

In this case the MPE contributed by the 916.5MHz radio is less than 2% of the overall MPE, and the total MPE is approximately 1/50 of the MPE Limit for 2.4 GHz radios. This before application of "source-based" time averaging over 30 minutes per § 2.1093 (d) (4) and § 1.1310.

The MMT9101 and MMT9102 are clearly within allowable FCC limits for MPE.

Sincerely,

James L. Henke
Principal Engineer