

# PHILIPS

December 20, 2022

Equipment Authorization and Compliance Branch  
Office of Engineering and Technology  
Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046

Dear Sir:

Philips Healthcare (“Philips”) submits this request for a Class II Permissive Change (“C2PC”) to FCC ID PQC-4843C pursuant to §2.1043(b) of the Commission’s Rules.

As discussed with Commission staff in previous guidance this request will combine two equipment authorizations into a single authorization for equipment that is used to provide patient monitoring in health care facilities. Philips requests that its Part 95 equipment authorization be modified to include the Part 27 frequencies for equipment authorized to TerreStar Corporation (“TerreStar”) under FCC ID 2A24SAP1400A. There is no change to the design, circuitry or construction of this equipment.

As part of this C2PC request, Philips makes the following attestations consistent with the requirements in KDB 178919 D01:

KDB 178919 D01 Requirement	Philips Response
No hardware changes have been made	The hardware for the Philips and TerreStar certified equipment is identical, with no hardware changes
There is no increase in the output rating on new frequencies	There is no power increase in the certified devices*
The equipment class remains the same	The equipment classes for both the Philips and the TerreStar equipment are Licensed Non-Broadcast Station Transmitter
RF exposure changes must be addressed	RF Exposure has been evaluated for both the TerreStar and the Phillips certifications individually. The equipment will maintain the same or lower power levels and frequency hopping characteristics (it will not transmit simultaneously on Part 27 and Part 95 frequencies), and thus RF Exposure levels will not increase.
Only the original equipment manufacturer may implement the new frequencies	Philips is the original equipment manufacturer and will be the party implementing the new frequencies

\* The TerreStar Part 27 authorization included slightly higher output power levels than the Philips Part 95 authorization. During the upgrades of the Philips equipment, the output power levels of the new Part 27 emissions will be reduced such that they do not exceed the originally granted Part 95 output power levels.



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TerreStar is working with Philips and is aware of, and has cooperated with Philips in preparing this request for C2PC to add the Terrestar certification to the Philips grant of equipment authorization.

Philips will upgrade software in already fielded units consistent with the requirements in KDB 594280 (Section VI). Specifically, software upgrades will only be performed by Philips field engineers (i.e., no upgrades will be performed by third parties), and will not be done via remote programming. A copy of the Philips software update procedures is attached to this Inquiry.

Accordingly, Philips requests that the Division issue a C2PC for the equipment. If you need additional information, please contact the undersigned or our outside counsel, David Siddall, at [david@davidsiddall-law.com](mailto:david@davidsiddall-law.com).

Respectfully submitted,



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