CARDIONET
MONITORING AT THE SPEED OF LIFE

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June 26, 2002

Joe Dichoso
FCC Application Processing Branch

Re: FCC ID QBI-1001
Applicant: Cardionet
Correspondence Reference Number: 23094
731 Confirmation Number: EA405725

Dear Mr. Dichoso,

This is to follow up with your request for clarification with regards to the test data that has been submitted to you for review. Our Monitor product Model number 1001 uses the CDPD Wireless Radio Modem produced by Novatel Wireless, Inc. The items in question requiring clarification I will address them in order:

Please address the following RF safety and EMC Questions...

RF safety...

J.Dichoso: Revised SAR plots and photos not submitted, still need upload. After receipt, final SAR compliance will be evaluated and more info requested if needed

CardioNet: We are submitting the entire SAR Test Report which has been created in PDF format this should be of higher quality than the copied one sent to you.

J.Dichoso: SAR reports for Minstrel products will not be used to evaluate compliance for Cardionet device

CardioNet: Understood

J.Dichoso: Pages 1-13 of External Photos are Cardionet devices, pages 14-39 are not.

CardioNet: With the entire SAR Report that is being resubmitted for your review it will describe how the instruments used in the testing were setup, calibrated and how our product was verified.

J.Dichoso: RF Exposure Info manual exhibit states:

> "This device has been tested for compliance with a separation distance of 4 cm from a person's body. The operating configurations of this device generally do not support normal transmissions while it is carried in pockets or holsters next to a person's body."
>
> SAR was done with device touching phantom. Please explain why RF exposure statement refers to 4 cm spacing.

CardioNet: The data on the 4cm separation is incorrect. Please review the actual test report from Intertek Testing Service who performed our actual SAR testing with the Monitor touching the Phantom at its back side and an antenna distance of 16.5mm in horizontal plane and 13.5mm on it's front side. This was the actual distance the measurements were made from to simulate the close proximity of the device to the human body. Our plastic enclosure housing is only this thick. If you compare the limitations of spatial peak (1g) with a SAR criteria of 1.60W/kg our device is well under this upper limit. (please reference page 17 of 46 of the SAR Report for both the Monitor and the Sensor. These measurement were for both the 800MHz and 900MHz domains.

J.Dichoso: Cover letter states:

> "Although our Monitor can be used in the hand we consider it a
>
> body worn device which is carried in a fanny pack around the torso."
>
> This contradicts the above RF exposure statement. Please revise RF exposure statement accordingly.

CardioNet:

The Monitor may be carried in a fanny pack, pants pockets or in a purse.

> **EMC QUESTIONS...**
>
> **Comparison test reports are not applicable to show compliance and are not needed. Provide the test report that is used for the actual tests for the product applied for. Clearly indicate this report and all other reports will be deleted to avoid confusion.**

Please feel free to contact me with any concerns or question you may have to assist in you approval process.

Best regards,

Gary Thomas
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cc: Mr. Tim Harrington

Incl: ITS SAR Test Report

SAR Test Report.pdf