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Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Berlin, 2006-09-27

Re: Statement to the FCC ID:

FCC ID: QRILUMAXT Labeling Scheme

Per 47 CFR 2.926 (e),

"Where it is shown that a permanently affixed nameplate is not desirable or is not feasible, an alternative method of positively identifying the equipment may be used if approved by the Commission. The proposed alternative method of identification and the justification for its use must be included with the application for equipment authorization. Note: As an example, a device intended to be implanted within the body of a test animal or person would probably require an alternate method of identification."

Since the EUT is implanted in the human body, the FCC ID will not be applied to outside of the device.

Instead, the applicant is proposing the following alternate method of applying the FCC ID number to two locations:

1. The FCC ID, along with the disclosure statement required by 95.1215(a), is in the User Manual.
2. The FCC ID also appears on the package label, which is affixed to outside of the shipping box for the Lumax devices.

Sincerely


Gunnar Boersch
Manager Regulatory Affairs

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