

Re: FCC ID: S8IWPMS
>
> Applicant: Edwards Lifesciences LLC
> Correspondence Reference Number: 29753
> 731 Confirmation Number: TC586560
> Date of Original Email: 06/29/2006

TCB to coordinate and provide response:

1) 2.962(f) stipulates that TCB grants must be in accordance with FCC rules and policies. Guidance from Oct04 FCC/TCBC info-meeting notes for WMTS portable RF exposure evaluation is excerpted below. RF exposure exhibits in this filing do not appear to be in accordance with this TCB procedure - please explain, and revise filing where appropriate.

2) Further to previous corresp. in this filing, new EMC test report does not appear to contain any info about 2.1046 compliance, as required by 2.1033(c)(14) - please explain and revise where appropriate.

3) New EMC test report does not appear to contain any info about 2.1033(c)(7) compliance - please explain and revise where appropriate.

Please refer to a summary table on pp.4-5 of the revised test report, for correlation of measurements with Part 2 and Part 95H requirements.

1) RF output power from the EUT, as calculated from measured field strength on p.54 of report ($EIRP = E - 95.3 = 78.4 \text{ dBuV} - 95.3 = -16.9 \text{ dBm} \Rightarrow 0.02 \text{ mW}$), is 0.02 mW EIRP. This is derived from the source-based, time-averaged output of the EUT as shown on pp. 13-14 of the test report.

This value appears to comport with the exception provided in Guidance from Oct04 FCC/TCBC info-meeting notes for WMTS portable RF exposure evaluation.

Our RF Exposure evaluation says:

The maximum possible SAR value in 1 g sample resulting from this power would be 0.02 mW/g. Compare to SAR limit 1.6 mW/g, the maximum possible exposure is 80 times below the limit. This is sufficiently below the limit to assure compliance without further evaluation.

We looked on FCC website and noticed that all applications under part 95H with output power less than 1 mW have pretty much the same statement.

2) EUT has no antenna port, so RF power was determined from field strength according to calculation documented in the filing, p.54.

As fundamental limits are expressed in terms of field strength rather than EIRP in 95.1115(a)(2), radiated power measurement method of TIA-603-C was not used. See report pp. 16-18 for confirmation of compliance with 95.1115(a). Measurement per TIA-603-C can be performed.

3) 2.1033(c)(7) refers to "maximum power rating as defined in the applicable part(s) of the rules." The 95H rules do not define maximum power, but rather maximum field strength (740 mV/m at 3m). The limit was converted to 117.4 dBuV/m for comparison with measured results on pp.16-18 of the test report.

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