JTECH MEDICAL
MEASURING HUMAN PERFORMANCE

October 21, 2004

TCB
TÜV America, Inc.
10040 Mesa Rim Road
San Diego, CA 92121

Dear Sir or Madam:

We, JTECH Medical,(470 Lawndale Drive, Ste. G, SLC, UT 84116), hereby authorize TÜV America, Inc. (10040 Mesa Rim Road, San Diego, CA 92121, Tel. (619) 546-3999) to act as our agent in all matters relating to applications for equipment authorization, including the signing of all documents relating to these matters. I further certify that the applicant nor any party to the application is subject to a denial of Federal benefits, that includes FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

This authorization expires on October 21, 2005.

Sincerely,

Darrell Barnhart
Director of Engineering
Phone: 801-478-0680 ext. 240
Fax #: 801-478-0674

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October 21, 2004

TCB
TÜV America, Inc.
10040 Mesa Rim Road
San Diego, CA 92121

Re: Request of Confidentiality

Pursuant to Sections 0.457(d)(1)(ii) and 0.459 of the Commission's Rules, the Applicant hereby requests confidential treatment of information accompanying as outlined below:

- Schematics
- Operating Descriptions
- Block Diagrams

The above materials contain trade secrets and proprietary information not customarily released to the public. The public disclosure of these matters might be harmful to the Applicant and provide unjustified benefits to its competitors.

The Applicant understands that pursuant to Rule 0.457(d)(1)(ii), disclosure of this Application and all accompanying documentation will not be made before the date of the Grant for this Application.

Sincerely,

Darrell Barnhart
Director of Engineering
Phone: 801-478-0680 ext. 240
Fax #: 801-478-0674

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470 Lawndale Dr., Suite G
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TCB, Judy Evans
TÜV America
10040 Mesa Rim Road
San Diego, CA 92121

October 21, 2004

Re: Limited Module Form

JTECH Medical's Wireless Tracker System (WTS) radio frequency transmitter is a self-contained unit that integrates all the necessary components for transmission on a single circuit card assembly, including a permanently attached antenna. JTECH wishes to apply for Part 15 Unlicensed Modular Transmitter approval.

1. The modular transmitter must have its own RF shielding. This is intended to ensure that the module does not have to rely upon the shielding provided by the device into which it is installed in order for all modular transmitter emissions to comply with Part 15 limits. It is also intended to prevent coupling between the RF circuitry of the module and any wires or circuits in the device into which the module is installed. Such coupling may result in non-compliant operation.

   Response: The transmitter has been tested and found to comply with Part 15 limits, specifically 15.249, and does not rely on RF shielding from a device into which it is installed.

2. The modular transmitter must have buffered modulation/data inputs (if such inputs are provided) to ensure that the module will comply with Part 15 requirements under conditions of excessive data rates or over-modulation.

   Response: The transmitter inputs are buffered and are illustrated on page 4 of 4 in schematic 23031_2sch.pdf previously submitted.

3. The modular transmitter must have its own power supply regulation. This is intended to ensure that the module will comply with Part 15 requirements regardless of the design of the power supplying circuitry in the device into which the module is installed.

   Response: The transmitter has its own power supply regulation illustrated on page 2 of 4 in schematic 23031_2sch.pdf previously submitted.

4. The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c). The antenna must either be permanently attached or employ a "unique" antenna coupler (at all connections between the module and the antenna, including the cable). Any antenna used with the module must be approved with the module, either at the time of initial authorization or through a Class II permissive change. The "professional installation" provision of Section 15.203 may not be applied to modules.

   Response: The transmitter has a permanently attached antenna as identified on page 3 of 4 in schematic 23031_2sch.pdf previously submitted and illustrated on assembly drawing 23029_2asm.

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5. The modular transmitter must be tested in a stand-alone configuration, i.e., the module must not be inside another device during testing. This is intended to demonstrate that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed. Unless the transmitter module will be battery powered, it must comply with the AC line conducted requirements found in Section 15.207. AC or DC power lines and data input/output lines connected to the module must not contain ferrites, unless they will be marketed with the module (see Section 15.27(a)). The length of these lines shall be length typical of actual use or, if that length is unknown, at least 10 centimeters to insure that there is no coupling between the case of the module and supporting equipment. Any accessories, peripherals, or support equipment connected to the module during testing shall be unmodified or commercially available (see Section 15.31(i)).

   Response: The transmitter was successfully tested according to Part 15.249 requirements in a stand-alone configuration. There are no AC or DC power lines attached because the module is battery powered. There are no data input/output lines containing ferrites.

6. The modular transmitter must be labeled with its own FCC ID number, and, if the FCC ID is not visible when the module is installed inside another device, then the outside of the device into which the module is installed must also display a label referring to the enclosed module. This exterior label can use wording such as the following: "Contains Transmitter Module FCC ID: XYZMODEL1" or "Contains FCC ID: XYZMODEL1." Any similar wording that expresses the same meaning may be used. The Grantee may either provide such a label, an example of which must be included in the application for equipment authorization, or, must provide adequate instructions along with the module which explain this requirement. In the latter case, a copy of these instructions must be included in the application for equipment authorization.

   Response: The transmitter is labeled with its own FCC ID number. The device the modular transmitter is installed in will display a statement similar to "Contains FCC ID: XYZMODEL1".

7. The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements. A copy of these instructions must be included in the application for equipment authorization. For example, there are very strict operational and timing requirements that must be met before a transmitter is authorized for operation under Section 15.231. For instance, data transmission is prohibited, except for operation under Section 15.231(e), in which case there are separate field strength level and timing requirements. Compliance with these requirements must be assured.

   Response: The transmitter has been tested, and found to be in accordance with Part 15.249 at TUV America. There are no known special instructions above the labeling requirements of 15.19 labeling requirements stating "This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions": and (1) "This device may not cause harmful

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interference, and, (2) This device must accept any interference received including interference that may cause undesired operation."

8. The modular transmitter must comply with any applicable RF exposure requirements. For example, FCC Rules in Sections 2.1091, 2.1093 and specific Sections of Part 15, including 15.319(i), 15.407(f), 15.253(f) and 15.255(g), require that Unlicensed PCS, UNII and millimeter wave devices perform routine environmental evaluation for RF Exposure to demonstrate compliance. In addition, spread spectrum transmitters operating under Section 15.247 are required to address RF Exposure compliance in accordance with Section 15.247(b)(4). Modular transmitters approved under other Sections of Part 15, when necessary, may also need to address certain RF Exposure concerns, typically by providing specific installation and operating instructions for users, installers and other interested parties to ensure compliance.

   Response: The WTS RF transmitter is compliant with Part 15.249. The maximum radiated RF energy is less than 0 dBm. The WTS RF transmitter operates at a maximum rate of 30 Hz for 6 seconds per hour Chip Flurey stated, and confirmed with another source during the initial visit to TUV America that due, in part, to the low power and minimal transmission periods SAR requirements are not applicable to this module.

If compliance with one or more of the numbered requirements, listed above, cannot be demonstrated, it may be possible to obtain a "Limited Modular Approval" (LMA). This will be issued in those instances where the Grantee can demonstrate that it will retain control over the final installation of the device, such that compliance of the end product is assured. In such a case, an operating condition on the grant of equipment authorization for the module would state that the module is only approved for use when installed in devices produced by a specific manufacturer, typically the Grantee. If LMA is sought, the application for equipment authorization must make this fact clear. It must also specifically state how control of the end product, into which the module will be installed, will be maintained, such that full compliance of the end product is always ensured.

JTECH Medical's Tracker Freedom radio frequency transmitter complies with the LMA in its present state but it would be preferred to pursue the Unlicensed Modular Transmitter Approval.

Darrell Barnhart

Director of Engineering, JTECH Medical

ZEVEX

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April 13, 2004

TÜV America Inc.
Product Service Division
Management Service Division
10040 Mesa Rim Road
San Diego, CA 92121

Phone: 858-678-1400
Fax: 858-546-0364

Re: Transfer of Ownership

To Whom It May Concern:

This letter is to authorize TUV America, Inc. to release all submittal information regarding the Wireless Tracker System (Grantee Code is RIB, FCC Identifier: RIB-AS-23657) to JTech Medical.

Ownership of the product has been transferred to JTech Medical by ZEVEX International, Inc.

Sincerely,

Phill McStotts
CFO, ZEVEX International, Inc.

Phill McStotts
CFO, ZEVEX International, Inc.

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October 28, 2004

TCB, Judy Evans
TÜV America
10040 Mesa Rim Road
San Diego, CA 92121

Re: Prior TCB Submissions

ZEVEX transferred ownership of the Wireless Tracker System to JTECH Medical (see ZEVEX letter dated April 13, 2004). JTECH, per this letter, verifies that the Wireless Tracker System, ZEVEX FCC ID: RIB-AS-23657 is identical in schematics, block diagram and data contained in the test report dated 18 September 2003. All other items associated with the ZEVEX filing are identical.

Sincerely,

Darrell Barnhart
Director of Engineering

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