

Applicant Name:	Medical Intelligence
Product Name:	Model: CLM-BRA-001 Bracelet
Certification Number: (FCC ID or IC:)	FCC ID: TV9-MICLM-C001
Customer Reference No:	Columba Bracelet

FCC Questions	Applicant Response
<p>1) Per Suppl. C, SAR tests should use normal operation power source, rather than external power suppl! y. If not in exhibits already, please explain use of external supply, effects of leads on exposure conditions, etc.</p> <p>"The use of external DC power adapters or other signal leads that are not normally required during normal use should be avoided because they may perturb the field and change the exposure conditions."</p> <p>"Unless an external DC power adapter or other signal leads are required for the normal operation of a device, such as connecting a headset to the device for body-worn use, they should not be used in the SAR tests."</p> <p>2) In this PBA stage, please submit internal photos showing antenna, chassis assy, etc</p>	<p>Response:</p> <p>At the time of the EMC and SAR certification testing the manufacturer did not have a charging unit that was capable of fully charging the internal battery and therefore a power supply was used for the evaluations. The power supply leads may affect the SAR distribution and power drift; however we would expect any change in SAR to be negligible and would not change the measured levels significantly. The measured SAR levels are considerably low and therefore a marginal change in the SAR levels would not result in an issue of non-compliance with the SAR limit.</p> <p>Response:</p> <p>Please refer to internal photograph exhibits:</p> <ul style="list-style-type: none"> <li>• <b>Internal Photos</b></li> <li>• <b>Battery</b></li> <li>• <b>Antenna</b></li> </ul>
<p>3) It is somewhat unclear how flat-phantom setup would be representative for wrist-worn device with curved back face creating a relatively large air-gap that would not be present in normal use, also depending on device design, antenna position, etc. For some curved-back-face large-gap conditions, some testing for example in SAM twin-phantom neck region may be appropriate.</p>	<p>Response:</p> <p>Please refer to the following supplementary engineering test report for SAR measurements made in the neck region of the SAM twin phantom:</p> <ul style="list-style-type: none"> <li>• <b>Addendum Columba SAR Report</b></li> <li>• <b>Addendum 835MHz System Validation Body</b></li> <li>• <b>Addendum 1900MHz System Validation Body</b></li> <li>• <b>Addendum ET3DV6-1387 Probe Calibration</b></li> <li>• <b>Addendum EX3DV4-3600 Probe Calibration</b></li> </ul>

## CERTIFICATION CHECK LIST

4) Usr man has CLC not FCC - if marketing and operation in US are intended, such that FCC grant is appropriate, operating and RF exposure info should be relative to FCC RF exposure requirements.

Response:

Please refer to page 21 of revised user manual exhibit **USERGUIDE-4us**

The applicant has included the following USA/Canada RF exposure compliance statement:

*"The Medical Intelligence Technologies Inc. Model: Columba PCS/Cellular GSM/GPRS Wrist-Worn Personal Location device FCC ID: TV9-MICLM-C001 complies with SAR (Specific Absorption Rate) RF exposure requirements specified in FCC 47 CFR 2.1093 and Health Canada's Safety Code 6 for the General Population / Uncontrolled Exposure Environment."*

Response:

Please refer to page 10 of **Test Report Part 24E** 1900 MHz output power is 30.66 dBm EIRP and page 12 of **Test**

**Report 22H** 800 MHz output power is 19.5 dBm, and on page 34 radiated output power is 22.57 dBm ERP

See page 4 of **Columba FCC-IC SAR Report**

Response:

Please refer to **Bracelet Operational Description** for a description user controls and call duration.

5) If not in exhibits already, per 2.1046 please provide info about measured or nominal conducted output power

6) If not in exhibits already, please provide info about user control or automatic mechanisms to transmit data – 1 call a week or 10 calls a day for what durations, source-based time-averaging considerations

7) If not in exhibits already, please provide info about whether and how other operating configurations and exposure conditions (1-g SAR) may apply besides wrist-worn 10-g SAR

8) User man mentions "2.402 GHz, maximum power 10 dB", but other info not found - please explain

Response:

This device functions as a speaker-phone for voice communications and is not intended or required to be held in close proximity to the face. 1 gram body-worn SAR levels are reported to show compliance if the device were worn further up the arm than at the wrist.

Response:

See page 18 of revised user manual **USERGUIDE-4us**.

This equipment does not transmit 2.4 GHz it can only receive 2.4 GHz from an another device FCC ID: TV9-MICLM-B001 that will be certified under 15.249 TX 2.4 GHz.