

FCC ID: XNL-ORTHOSNSR1

CT Project: p1130004

To: Steve Schafer,

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From: Stan Lyles

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Re: FCC ID: XNL-ORTHOSNSR1

Applicant: Orthosensor, Inc

Correspondence Reference Number: 40595

Form 731 Confirmation Number: EA907250

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1) This Form-731 mentions a pre-filing KDB inquiry, and that KDB inquiry record had one attachment which seems to provide additional important device operating details; please submit similar or same attachment also as an op. desc. exhibit in this filing.

CT – Document regarding KDB 735131 has been uploaded for your review.

2) a) Per e.g. Fig. 5 in the SAR report, "Model S4" appears to be similar to or same as the device configuration shown in the EMC/radio test setup photos and in the internal and external photos exhibit. However we did not see in the filing external, internal, test setup photos for what in the other SAR report is called "Model Uni"; please provide similar photos for the "Uni" version. b) Please also provide descriptions for other technical and operating conditions where different between "Uni" and "S4" device configurations.

CT – These two devices only differ in form factor. Some implant manufacturers use a single polycarbonate component while other manufacturers have chosen to utilize two such components for the replacement knee. This transmitter can be supplied in either configuration for surgical purposes. In either configuration the normal operation has the transmitter between the two stainless steel knee components. In all cases it is the exact same transmitter PCB utilized. The RF characteristics are always in compliance with the FCC rules and the calculated SAR values were significantly below the limits.

Photos of the UNI device will be supplied with this response.

3) If not in filing already, please provide design nominal and/or test data for antenna feed-point conducted RF power.

CT – The pre-filing KDB included the possibility that there would be variations in housings and it was specifically asked if single filing would be acceptable. We were informed as long as the transmitter was always the same (it is exactly the same PCB which includes the antenna) and as long as we tested the low, middle, and high frequency a representative test of a single housing would be acceptable.

Response by: John Erhard Submitted by: Karen Springer

Date: December 6, 2011