

RE: GE Medical Systems, LLC

FCC ID: YYJ-5390144

ATCB019985

1. Section 9.0 of the EMC report states that AC line conducted (AClc) tests were not performed “because the UWB radio is powered by a PC USB port.” Please note that, per KDB174176)Q8), unless the EUT is solely battery-powered, with the battery clips on the pcb, AClc testing must still be performed, in this case, with the pc from which the EUT is drawing power, via USB, connected to the LISN. Please revise the EMC report to also include this required data.

RESPONSE: This device was already certified. The original certification, as well as subsequent Class II Permissive Changes used the identical rationale for not testing AC line conducted. This application is for the purpose of adding a replacement antenna for the 3 GHz and 6 GHz operation. An antenna replacement at these frequency ranges would not affect AC line conducted emissions. The testing that was performed for this application was to show that replacing the antenna with a different model will not cause the existing certified product to become non-compliant.

2. The EMC report references Section 15.519 for hand held UWB systems, however, it appears that the EUT might actually mount on a mast-like device (e.g., an X-ray machine), and then be activated via a remote switch (i.e., when the x-ray is taken). If this is the case, then the appropriate Section under which it should be authorized would appear to be 15.517, for indoor UWB systems. The various requirements in 15.517 differ somewhat from those found in 15.519 – please clarify, specifying the EUT's actual intended usage configuration.

RESPONSE: I agree that Section 15.517 would be the more appropriate section of the rules for this device. However, the original certification, as well as subsequent Class II Permissive Changes were tested and certified using Section 15.519. This application is for the purpose of adding a replacement antenna for the 3 GHz and 6 GHz operation. Replacing the antenna with a different model was not intended change the classification of the device. The testing that was performed for this application was to show that replacing the antenna with a different model will not cause the existing certified product to become non-compliant. Also note that the requirements of section 15.519 are more stringent than those of section 15.517. Therefore, test data showing passing results to section 15.519 could also be used to show compliance with section 15.517.

3. While the EMC report references Section 15.519 for hand held UWB systems (see previous comment), the RFx exhibit assumes a mobile usage configuration (i.e., >20cm separation distance), and not a portable usage configuration typically associated with hand held use. Please clarify. Please note that the RFx exhibit cannot be fully reviewed until the correct exposure condition has been ascertained.

RESPONSE: The device is a mobile device. As can be seen from the original certification and subsequent Class II Permissive Changes, RF exposure evaluations were always performed using a distance of 20 cm to the user.