restech
Respiratory Technology Corporation

PART 15 UNLICENSED MODULAR TRANSMITTER APPROVAL

Respiratory Technology Corporation is requesting that a Limited Modular Approval (LMA) be granted to our company. I understand that upon approval of this grant that the transmitter can only be integrated into the "Dx-pH Measurement System" by Respiratory Technology Corporation.

This system currently consists of the Dx-Transmitter (Item # Dx-300) and the Dx-Recorder (Item # Dx-500). One transmitter would be installed in each item.

Additionally, this letter covers the eight points that must be addressed in the application for equipment authorization.

1. The modular transmitter must have its own RF shielding. The devices do not have their own shielding as required for general Modular Approval use, but is acceptable under the Limited Modular Approval (LMA) grant rules. The transmitters will only be installed in Respiratory Technology Corporation Dx-pH Measurement Systems.

2. The modular transmitter must have buffered modulation/data inputs. The CC2420 Transceiver Integrated Circuit (IC) used in the Dx-pH Measurement Systems transmitters utilizes a built-in 128 buffered First In First Out (FIFO) for both RX and TX operation.

3. The modular transmitter must have its own power supply regulation. The CC2420 IC has a built-in 1.8V regulator that is enabled.

4. The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c). The antenna's used in the Dx-Transmitter and the Dx-Recorder (both part of the Dx-pH Measurement System) are permanently attached (soldered) to the circuit boards and cannot be removed or replaced.

5. The modular transmitter must be tested in a stand-alone configuration, i.e., the module must not be inside another device during testing: N/A. This transmitter is for a *Limited Modular Approval*. Transmitters will only be installed in Respiratory Technology Corporation Dx-pH Measurement System equipment and cannot be tested otherwise. This device is battery powered.

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: The transmitter board will be labeled with the FCC ID: TLUDx-System. The transmitter will be factory installed by Respiratory Technology into their own products. The exterior of the products will be labeled with a statement such as this: "Contains FCC ID: TLUDx-System". Please see FCC ID label and location exhibit.

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: User is notified in the instruction manual not to alter the device in any way:

   "Caution: Changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment."

8. The modular transmitter must comply with any applicable RF exposure requirements: Calculations were performed to ensure that the transmitter would not exceed power density limits set forth in OET 65. See attached document for included calculations and results.

Ross Tsukashima – August 29, 2005

Director, Product Development

restech
Respiratory Technology Corporation

DATE: 8/30/2005

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:

This product contains design items that we specifically declare as Trade Secrets:

Dx-Transmitter and Dx-Recorder Schematics
Dx-Transmitter and Dx-Recorder Parts List
Dx-Transmitter and Dx-Recorder Operating Description
Dx-Transmitter and Dx-Recorder Block Diagram

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,

Ross Tsukashima
Director of Product Development
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