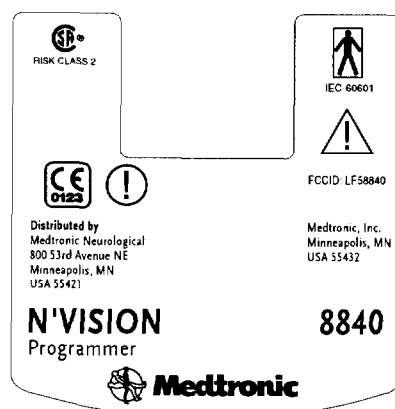


FCC ID: LF58840



UC200101312b EN / PN220335-002

8840 Programmer – Label Placement



The following documentation includes a letter from the FCC accepting that the compliance statement for a product similar to this product (FCC ID: LF57435) was not on the label, but in the User's Manual.

If this is not acceptable by the TCB for the unit we are currently submitting application for (FCC ID: LF58840), please request a ruling from the FCC.

FEDERAL COMMUNICATIONS COMMISSION
Laboratory Division, Equipment Authorization Branch
7435 Oakland Mills Road, Columbia, MD 21046
Telephone: (301) 362-3027, Facsimile: (301) 344-2050
July 1, 1999

TO: John Grevious
ORGANIZATION: Medtronic, Inc.

PHONE NUMBER: 612-514-5210

FAX NUMBER: 612-514-5612

FROM: Richard Fabina
NO. OF PAGES: 1

TITLE: Acting Chief, Equipment Authorization Branch

Please direct inquiries, if any, to the sender at the telephone number above.

Dear Mr. Grevious:

The following is in response to your faxes of May 28 and June 30, 1999, regarding proposed labeling changes to a device identified by FCC ID: LF57435. In the referenced communication, you ask if it is permissible to move the compliance statement required by Section 15.19(a)(3) of the FCC Rules from the label of the device to the user's manual. I apologize for the delay in answering this simple question. Apparently, the May 28th incoming correspondence was lost in our volume of paperwork.

Yes, it is acceptable to place the compliance statement in the user's manual of a device in accordance with Section 15.19(a)(5) of the Rules when the device is so small, or it is not practical, to place the compliance statement on it. We concur that this device meets this criteria to permit the compliance statement to be located in the user's manual.

I trust that this has answered your questions. However, if you have any additional questions about this matter, please contact me at the address or telephone numbers above.



Medtronic Neurological
800 53rd Avenue NE
P.O. Box 1250
Minneapolis, MN 55440-9087
Internet: www.medtronic.com
Telephone: (612) 514-5000
Toll Free: 1-800-328-0810
FAX: (612) 514-5078

Richard Fabina
Federal Communications Commission
Washington, D.C. 20554

May 28, 1999

Dear Mr. Fabina:

The purpose of this letter is to determine if we may be exempted from placing the FCC part 15 statement ("This device complies with...") on the labels of our hand held patient programmers. These programmers are best categorized as inefficient radiators that use short-range inductive coupling (i.e. within a few inches) at 175 kHz to communicate to implanted medical devices.

Presently we print both the FCC ID# and the FCC part 15 statement on both the device label and in the manual. We wish to make a universal label for worldwide use. The label designers require more print space on the label to accomplish this task. I understand such exemptions can be applied to other devices such as hearing aids where obvious space/size restrictions become an issue. In our case we have maximized the label size and use it for both user instruction and industry standards information. Please refer to the attached edited drawings (A, B, C1, C2, D) for an overview of this product and to better understand this request.

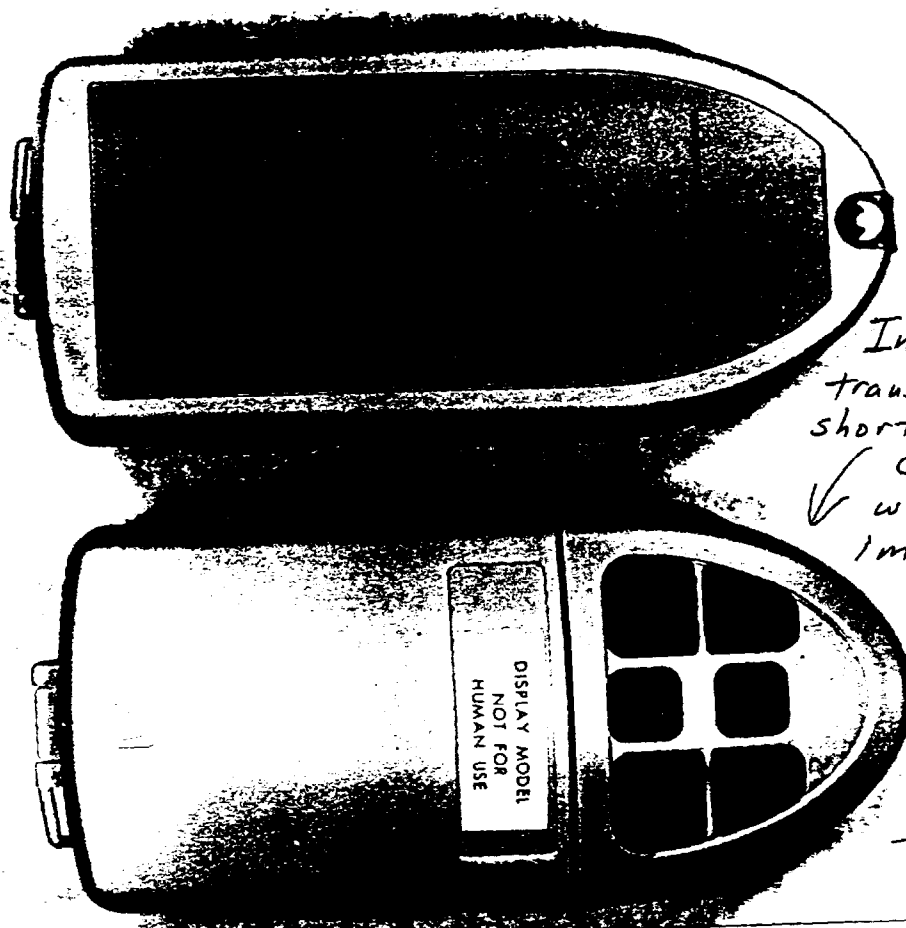
To meet the FCC labeling requirements and achieve our universal labeling needs we are requesting allowance to apply the FCC information per attachment D for our patient programmer products. Thank you for your time to review this request.

Sincerely,

A handwritten signature in black ink that reads "John Grevious". The signature is fluid and cursive, with the first name "John" being more prominent.

John Grevious
Principal Engineer
Medtronic, Inc.
Phone: (612) 514-5210
Fax: (612) 514-5612
e-mail john.grevious@medtronic.com

④



Inductive Coupled
transmitter for
short range (<1ft)
✓ communication
with medically
implanted products

Reference:

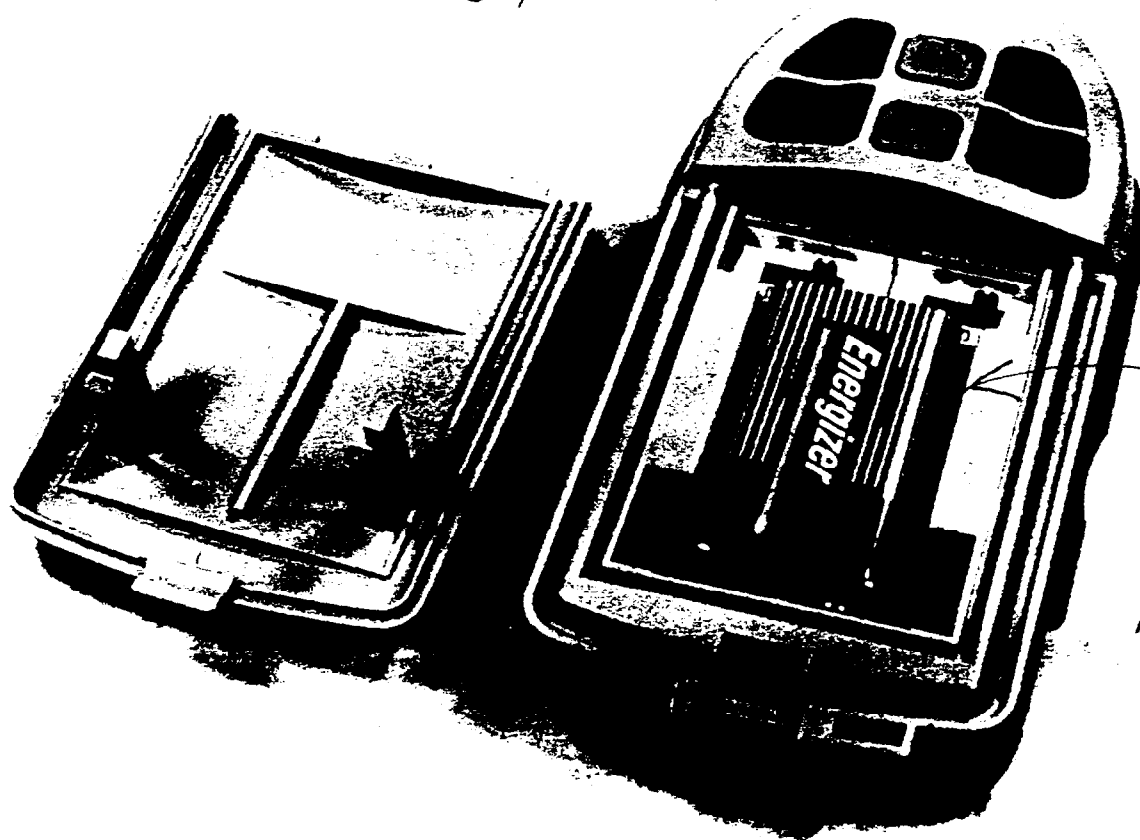
FCC ID #

LF57435

Conf #EA 93061

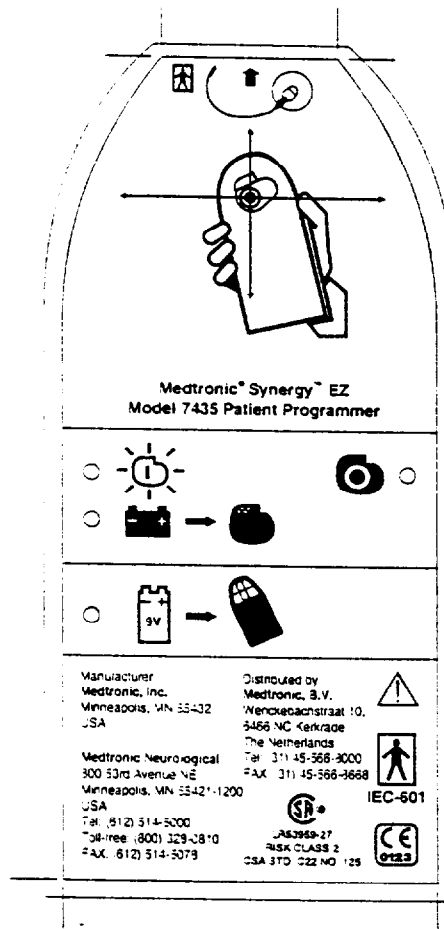
For more details

Note: These photos depict a sample of the device (Patient Programmer)
for which our labeling question applies.



9V Battery
provides scale
for these
photo's

(B)



User Instruction
Section

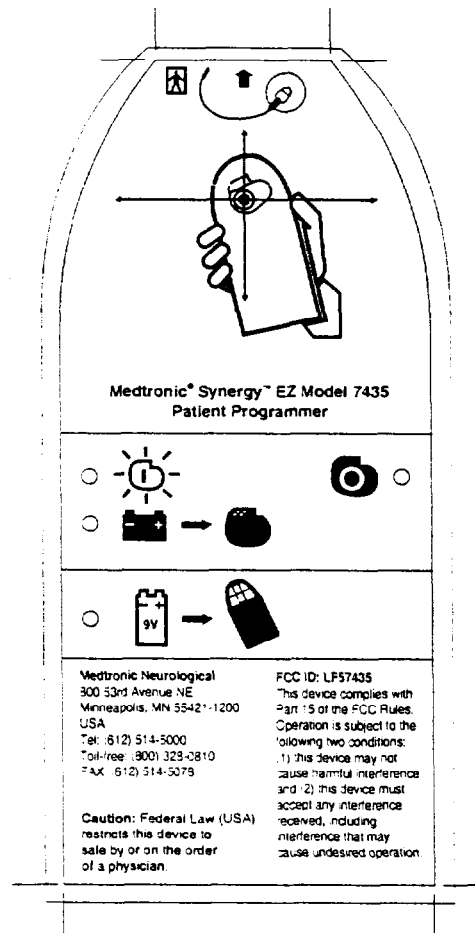
Operational Information
Section

Industry Standards
Section

- Label for use outside U.S.

UC9700819cEN/194733-004

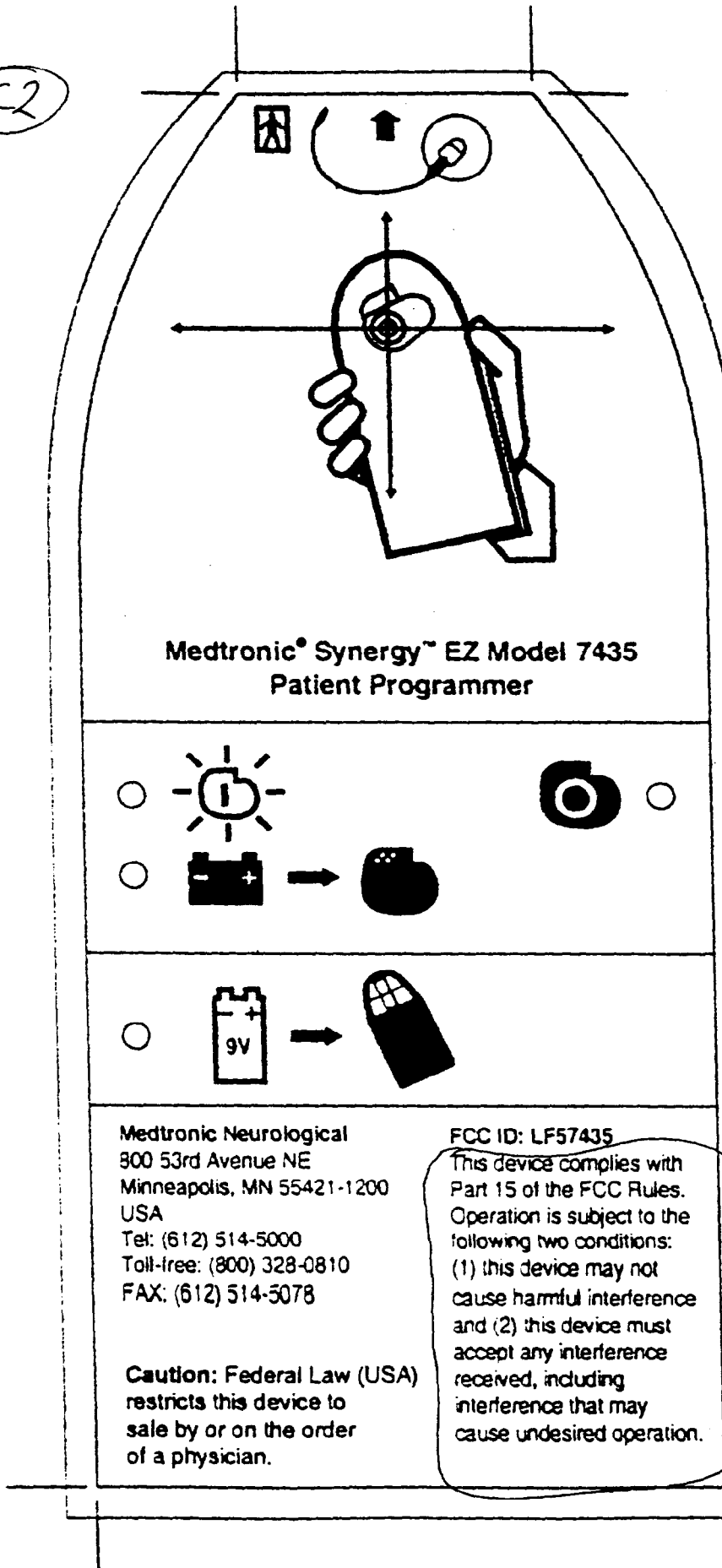
C1



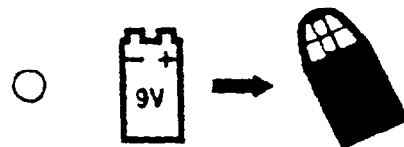
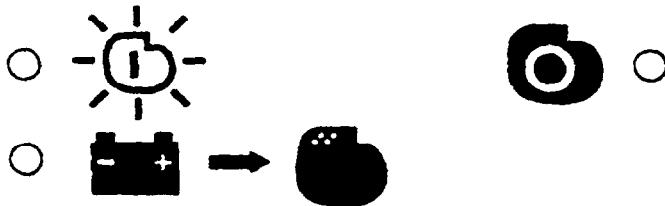
Example of Label used for products within the U.S.

UC9900344EN/220183_001

C2



Medtronic Synergy EZ Model 7435
Patient Programmer



Medtronic Neurological
800 53rd Avenue NE
Minneapolis, MN 55421-1200
USA
Tel: (612) 514-5000
Toll-free: (800) 328-0810
FAX: (612) 514-5078

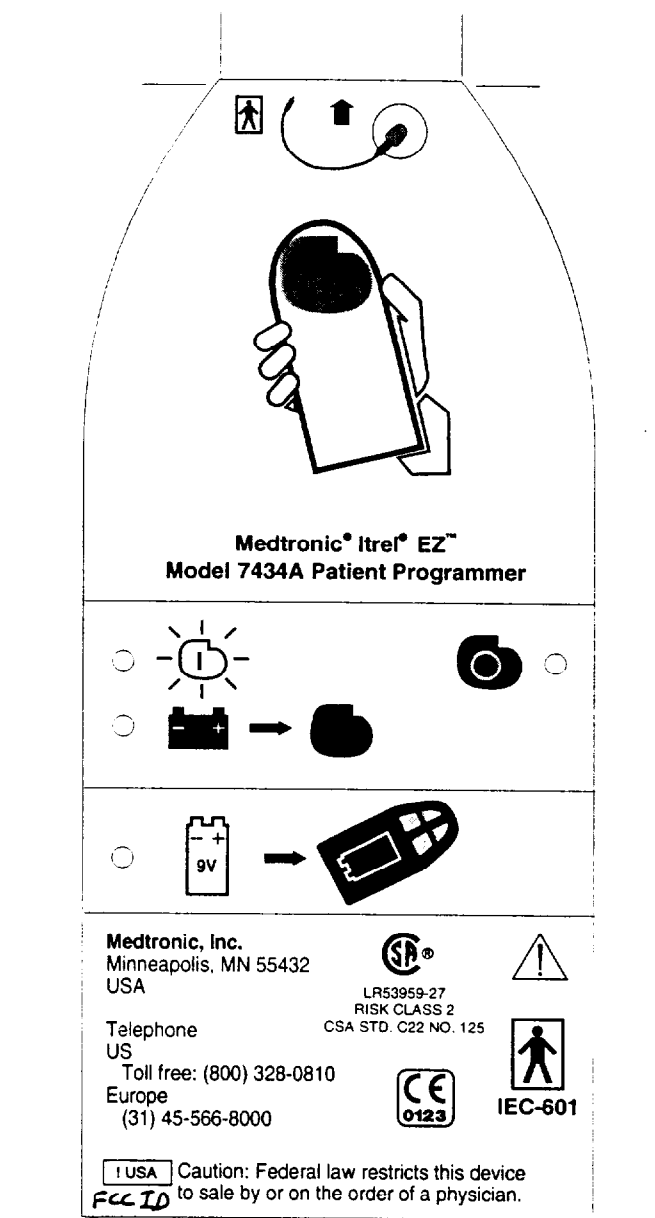
Caution: Federal Law (USA)
restricts this device to
sale by or on the order
of a physician.

FCC ID: LF57435

This device complies with
Part 15 of the FCC Rules.
Operation is subject to the
following two conditions:
(1) this device may not
cause harmful interference
and (2) this device must
accept any interference
received, including
interference that may
cause undesired operation.

- Our product label designers need more label space to achieve a universal label design.
- This statement is also provided in the device manual.

① A prototype DRAFT of a "universal label"



FCC ID: LF57435

Our request is to do the following:

- FCC ID # on external label.
- FCC ID # and full FCC statement ~~to be~~ printed in the device manual.

Draft

UC9900371 EE/220181-001