

To: Federal Communications Commission
Office of Engineering and Technology
7435 Oakland Mills Road
Columbia, MD 21046

From: Russell Anderson
CVRx Inc
9201 West Broadway
Suite 650
Minneapolis MN 55445

Date: November 14, 2013

Subject: Response to FCC Correspondence Reference Number: 44623

Dear Sir or Madam:

CVRx has received and acknowledges the correspondence referenced below from the FCC (Correspondence Reference Number: 44623, for Form 731 Confirmation Number: EA964542), and is providing this response. The response from CVRx is listed below each item sent by the FCC.

Also included in our return correspondence are the following documents:

1. CVRx Request for Confidentiality for FCC ID: SVHBAROSTIMIPG1 (to address items #2 below).
 2. RF Module Equivalency between CVRx IPG Model 2101 and Models 2100/ 2102 (to address item #3 below).
 3. Report Number: 100511823MIN-001 Rev 1.1 (to address items #5 - #7 below).
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From the FCC:

Re: FCC ID: SVHBAROSTIMIPG1
Applicant: CVRx
Correspondence Reference Number: 44623
Form 731 Confirmation Number: EA964542
Date of Original E-mail: 11/07/2013

Upon initial review of your equipment authorization application, the following points were noted:

1) Intended maximum output power does not appear to be noted within the application. Please identify the maximum output power desired for this device.

Response: The maximum radiated output power measured for this device is -39.5dbm, or 0.112 microwatts, or 0.000000112Watts.

2) The exhibit titled "Request for Confidentiality" is not signed. Please sign and update as necessary.

Response: A signed and updated "Request for Confidentiality" is now submitted with this response.

3) The exhibit titled "Model 2100 Model 2102 Equivalency", submitted as part of the test report, indicates that models 2100 and 2102 are exactly the same from an RF perspective. The exhibit titled "Report Summary", submitted as part of the exposure evaluation, indicates that models 2100 and 2102 are identical to the 2101 except for a RF difference. This RF difference between the 2101 and the other two models are described as an updated telemetry module. Please submit updated documentation further discussing this difference. Such documentation may include internal photos showing the telemetry module, discussion of how the telemetry module impacts the output signal, difference in total output power ratings, and the like. Furthermore, please ensure that all exhibits consistently show all model numbers for which their data is applicable.

Response: An "RF Module Equivalency between CVRx IPG Model 2101 and Models 2100/2102" memo is submitted with this response.

To add clarification; the original submission did not, but should have, explained that the exhibits which refer to the Model 2100 are also applicable to the Model 2102. The two models differ only by a single (fuse) component. The RF performance of these two models is identical. All of the submitted exhibits that referenced only the Model 2100 model are applicable to both the Model 2100 and Model 2102 models.

4) The submitted Form 731 indicates that this device is not part of a system that operates with, or is marketed with, another device that requires an equipment authorization. However, the exhibit "CVRx System Reference Guide" indicates that an associated base-station will be part of this system and will require equipment authorization. Please update the Form 731 as appropriate.

Response: The associated base-station is part of this system and we agree this will require equipment authorization. The testing is complete, and the report for the base station is being

prepared for submission by a qualified TCB. The FCCID for the base station is SVHBAROSTIMPGM1.

5) Throughout the submitted documentation, this device is referred to as MICS. The term MICS is now obsolete for the purposes of FCC authorizations and operations. Although revision is not required for this filing, for all future filings for similar devices, please ensure to use descriptions consistent with the rules in effect at the time of the applications submissions; i.e. in this case being MedRadio.

Response: The Test Report has been updated to reflect the new MedRadio label references, and is submitted in this response. CVRx appreciates this feedback, and will also note this in future applications.

6) The exhibit titled "Test Report" references 47 CFR 95.628. However, 95.628 applies only to MedRadio transmitters in the 413-419 MHz, 426-432 MHz, 438-444 MHz, and 451-457 MHz bands. Please update your test specification references to reflect changes to 47 CFR since the time this test was conducted (17OCT2011). The most recent CFR rules can be found at www.ecfr.gov.

Response: The Test Report has been updated to reflect the new test specification references and is submitted in this response.

7) The exhibit titled "Test Report" has identified several part 95 rule sections used for compliance demonstration. Please also note that 2.1033(c)(14) requires demonstrating compliance for 2.1046 to 2.1057. Per 2.911(b), compliance must be documented for both 2.1033(c)(14) and part 95. Please revise this document accordingly.

Response: The Test Report has been updated to reflect the new test specification references and is submitted in this response.