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**Philips Healthcare
Comments
Draft FCC Laboratory Division Publications Report
Medical Body Area Network (MBAN) Measurement Procedures
FCC Laboratory Division Publication: 670572 D01 MBAN v01**

Philips Healthcare (Philips) submits these comments on the above-referenced FCC Laboratory Division's Draft Measurement Procedures for MBAN Devices released on October 15, 2015.

Introduction

Philips commends the laboratory staff for this report. The guidance offered by it is very helpful as a guide to the Laboratory's equipment authorization process for Medical Body Area Network (MBAN) devices. We believe that it is comprehensive and consistent with the FCC's procedures applied generally to similar equipment while it recognizes the unique aspects of the regulatory requirements for MBAN devices.

Philips does wish to point out what appear to be two inadvertent errors. As discussed more fully below, the description of frequencies on Page 8 appears to be in error; and also the term "control message periodicity" appears to refer to transmission periodicity, but as adopted by the Commission was intended to refer to reception periodicity.

Section V.D., Unwanted Radiation Measurement

On page 8 at step V.D.1.r), reference is made to "2350-2360 MHz". This would duplicate step j). Instead, step p) provides for retuning to the upper band edge, making clear that the frequencies intended to be addressed in step r) are 2400-2410 MHz. Therefore "2350-2360 MHz" in step r) should be corrected to "2400-2410 MHz."

Sections VI.A. and VI.B., Frequency Coordination Attestation Requirements and Validation Tests

There appears to be confusion with the term “control message periodicity” as used at the below two places in the draft requirements.

(1) On page 10 at step VI.A.c), the MBAN manufacturers’ attestation is required to include, among other items, “Definition of the control message periodicity (maximum and minimum time between transmissions of valid control message.)” (emphasis added).

(2) Similarly, at page 11 at step VI.B.2.e), the term “control message periodicity” is used in the context of transmission: “Verify that DUT ceases transmission on frequencies within the prohibited band with a latency period not exceeding the maximum control message periodicity.”

These references indicate that the term “control message periodicity” is being used mistakenly with reference to **transmission** periodicity, whereas the Commission clearly intended **reception** periodicity. *See* the First Report and Order at para. 49:

We will require applicants for equipment certification to attest that they comply with the requirement that MBAN equipment receive the control message by describing the protocols that the devices employ including **the expected periodicity for reception of control messages** that will allow the MBAN transmitter to begin or continue operating in the band. [Emphasis added, fn. omitted.]

FCC ET Docket 08-59, 27 FCC Rcd 6422 at 6446 (2012).

Conclusion

Philips believes that the guidance offered by the corrected FCC Laboratory Division’s Measurement Procedures will be very helpful to all parties to guide regulatory compliance for Medical Body Area Network (MBAN) devices. We respectfully request implementation of the two above-noted corrections, and would be glad to discuss these or any additional matters related to MBAN.

Respectfully Submitted,

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November 20, 2015