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FCC MAIL BRANCH

PHILIPS

Philips Medical Systems

Magnetic Resonance

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March 23, 1991

FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Washington, D.C. 20554

MAR 25 1992

Federal Communications Commission
Office of the Secretary

COMMENT to PETITION LISTED on FCC PUBLIC NOTICE, REPORT NO. 1877
RM No. 7903. Rule Sec. 18.121 Petitioner: The Magnetic Resonance Sec-
tion of the National Electrical Manufacturers Association. Nature of Petition: Rules
to Exempt Non-Consumer Magnetic Resonance Diagnostic Systems From The
Technical Standards and the Reporting Requirements of the Commission's Rules.

PHILIPS MEDICAL SYSTEMS NORTH AMERICA COMPANY, a division of NORTH
AMERICAN PHILIPS COMPANY with its principal place of business located at 710
Bridgeport Avenue, Shelton Connecticut, 06484, supports the petition, RM No.
7903, filed by the National Electrical Manufacturers Association for, but not limited
to, the following reasons:

Over 1,000 Magnetic Resonance Systems (MRI) in use by the medical
profession have not caused interference or inconvenience to radio fre-
quency communications.

- Meeting Testing requirements of MRI system according to the FCC Rule,
does not represent the conditions when installed in a medical site. RF
Shielding for the MRI is custom installed and tested at each medical facil-
ity.

MRI systems are self testing for RF Shielding Integrity in normal everyday
patient use. Since MRI must sense minute RF signals emanating from
within the patient in order to produce diagnostic images, and since loss
of RF shielding integrity will cause patient image artifacts, loss of shield-
ing integrity will render the MRI system ineffective for medical use.

Philips Medical Systems request FCC consider this petition and provide the re-
quested amendment for MRI Exemption from the testing and associated records. in
the light of reducing unnecessary, inappropriate and costly testing in order to help
control the increasing cost of medical care and thereby increase the availability of
this non-invasive diagnostic modality to the general public.

PHILIP GRISWA
VICE PRESIDENT, MARKETING