



RM-7903

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MAR 25 1992

Technical Support Branch
Authorization and Registration Division

March 20, 1992

Office of the Secretary
Federal Communications Commission
1919 M Street
Washington, DC 20554

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MAR 23 1992

Re: Petition for Exemption by MR Section of NEMA, 01-29-92
Rule Sec 18.121

FCC MAIL ROOM

Gentlemen:

Picker International Inc. is a major U.S. manufacturer of diagnostic imaging equipment and has its corporate headquarters located in Cleveland, Ohio. As a Member Company of the National Electrical Manufacturer's Association (NEMA) Diagnostic Imaging and Therapy Division, Picker International wishes to express its support for the petition to amend the Commission's rule to exempt Magnetic Resonance Imaging Systems from the technical standards and reporting requirements of the Commission's rules. Picker has actively participated in shaping this petition to the FCC for the exemption.

As an industry leader in the field of Magnetic Resonance Imaging, Picker has been involved in the design and manufacture of MR equipment for more than 10 years. During that period we have produced and installed more than 350 MR Imaging Systems. This includes over 100 mobile units which travel to multiple facilities. Over this period there has been no reported incident of interference related in any way to the operation of these MR systems. This is necessarily true because effective operation on an MR system requires the elimination of any RF interference. MR is itself a most sensitive detection system for RF noise, thus it is unnecessary to require additional testing to demonstrate this.

It is the opinion of Picker International that this petition should receive favorable consideration from the Commission based upon the nature of the Magnetic Resonance Imaging technology and supported by the lack of any incidence of RF interference from the large installed base of MR systems throughout the U.S. This exemption will provide relief for manufacturers who already must comply with an extensive number of complex regulations in a cost sensitive environment.

Sincerely,

Elaine K. Keeler, PH.D.
Manager, NMR Regulatory Affairs