

HITACHI

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Federal Communications Commission
Office of the Secretary, Room 222
1919 M Street, NW
Washington, DC 20554
Ph: (202) 632-6410

Re: Amendment of Part 18 to Remove Unnecessary Regulations Regarding
Magnetic Resonance Systems

To: The Commission

We at Hitachi Medical Systems America wish to express our support for the FCC
Notice of Proposed Rule Making ('NPRM') in Docket 92-255.

As the Commission has already noted in the NPRM, the economic benefits to be
realized by removing the burden of unnecessary regulation from Magnetic
Resonance systems far exceed the minimal risk of interference that is posed by MR
systems.

The National Electrical Manufacturers Association ('NEMA'), Diagnostic Imaging
and Therapy Division, Magnetic Resonance Section, of which Hitachi is a member,
established that the cost of testing MR systems to determine their specific RF
emanation levels would create substantial burdens on Hitachi and other MR system
manufacturers in its 'Petition for Rulemaking' (RM-7903). As previously noted by
NEMA, MR systems are typically installed in hospitals and other health care
facilities, in well-shielded environments designed to protect the MR system from
outside electromagnetic interference. This shielded environment further acts
effectively to prevent the emanation of RF signals generated by the MR system to
the environment outside of the MR system, where these emanated RF signals could
create objectionable interference to other devices or systems. The MR systems are
designed for customized installations in each hospital or health care facility;
therefore, testing in an "open field" environment or at Hitachi's manufacturing
facility would be a costly and burdensome requirement, with little relevant
information to be gained from the test results. Further, on-site testing at the

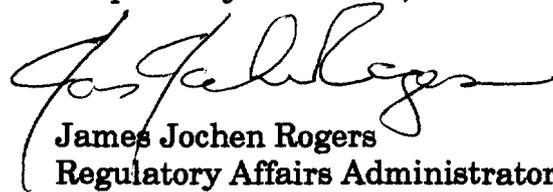
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hospital or health care facility is a virtual impossibility, given the high level of background electromagnetic noise levels associated with these environments and the generally confining quarters in which MR systems are installed.

The absence of any reported incidents of interference traced to an MR system should be strong supporting evidence that these systems are able to operate within their normal operating environments without creating RF interference to other licensed and unlicensed systems. Further, we cite similar prior circumstances, in which the Commission exempted non-consumer medical ultrasound equipment from Part 18 rules. Finally, the substantial cost burden of testing MR systems can significantly and adversely affect the unit cost of each MR system, contributing the increasing costs of medical care. The rising costs of medical care, and the containment of such costs, are just as much a major concern to the American consumer as they are to Hitachi and other MR system manufacturers. The exemption from the reporting and testing requirements will ensure that such unnecessary economic costs are not imposed on this portion of the health care industry.

We, therefore, urge swift adoption of the rules proposed in NPRM to exempt non-consumer magnetic resonance diagnostic systems from the technical standards and the reporting requirements of the FCC's rules.

Respectfully submitted,



James Jochen Rogers
Regulatory Affairs Administrator
Hitachi Medical Systems America

Enclosures: 9 copies