

We have no comment on the details of this proposed rulemaking, but we do have one comment on a point of principle. As the UK regulatory body for medical devices, we consider that very short range inductive coupling, as used for example by cochlear implants and by programmers for implanted pacemakers, should not be considered as radio communication, and therefore that such devices should be permitted to operate in any band and with any bandwidth that their manufacturers find suitable for the intended medical purpose, provided only that the emissions are within the CISPR limits for incidental emissions and therefore that the devices can be expected not to interfere with any other users of the spectrum.