



TomoTherapy®
A wholly owned subsidiary of Accuray

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To: The Federal Communications Commission

From: John R. Kenney

Date: 26 Jun 2014

Re: Application for an Experimental License

The Japanese Ministry of Internal Affairs and Communications (MIC) has informed Accuray, Inc. that its TomoTherapy HDA radiation therapy system is not in compliance with Japanese wireless standards. The reason for this stems from a wireless access point used for communications within the system that complies with all FCC wireless standards, not MIC standards. Specifically, channels within the 5 GHz bandwidth are used for Orthogonal Frequency Division Multiplex (OFDM) communications that are not approved in Japan.

The goal of this research project is to demonstrate that the Cisco AIR-CAP2602E-Q-K9 Wireless Access Point (WAP), approved for use in the Japanese Regulatory Domain, complies with all user and engineering input requirements of the Accuray TomoTherapy HDA product line. Testing must be completed in Madison, WI, as there are no capable test facilities within Japan to validate the product.

There is very low risk of this device interfering with the external environment. Operation of the requested WAP will take place only within a testing bunker approved for the use of a device that emits high energy X-ray radiation. Surrounding the bunker are 3-foot thick walls of concrete, which attenuate all radiation coming from the within the bunker. Therefore, there is no risk of the WAP interfering with other devices or the environment outside of the testing bunker.

Accuray hereby requests an Experimental License from the Federal Communications Commission to import and validate Cisco AIR-CAP2602E-Q-K9 Wireless Access Points so that the Accuray, Inc. may distribute fully compliant radiation therapy systems within the country of Japan.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JR Kenney', written over a horizontal line.

John R. Kenney
Service Development Engineer
Accuray, Inc.