January 15th, 2006

NESS L300 Control Unit – Duty Cycle declaration

Federal Communications Commission

7435 Oakland Mills Road

Columbia, MD 21046

We the undersigned, hereby certify that NESS L300 Control Unit's (CU) transmitter (FCC ID: TVF-L300-CU-V10) operates in Duty Cycle (DC) not larger than 28% (Measured on any 100 mS period).

The Duty Cycle calculation is based on the following data:

- Heel events acknowledge messages -
  1. Maximal number of events received in each 100 mS period - 1
  2. Acknowledge transmission time - < 2mS
  3. Acknowledge retransmissions – 4
- User input on the Control Unit messages -
  1. Maximal number of user inputs in each 100 mS period – 1
  2. Event transmission time - < 2mS
  3. Retransmission interval – 10 mS
  4. Maximum retransmissions in 100 mS period - 10 retransmissions
- Status information is transmitted as part of one of the aforementioned messages.

Hence:

$$DC_{[CU]} = \frac{\left(1_{[\text{heel event}]} \times 0.002_{[\text{sec/event}]} \times 4_{[\text{retransmissions}]}\right) + \left(1_{[\text{heel event}]} \times 0.002_{[\text{sec/event}]} \times 10_{[\text{retransmissions}]}\right)}{0.1_{[\text{sec}]}}$$

$DC_{[CU]} < 28\%$	$20*\log_{10}(DC_{[CU]}) < -11\ dB$

Sincerely,

Amit Dar

R&D and Clinical manager