March 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-V20) operates in Duty Cycle (DC) not larger than 27% per channel (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 - < 3mS
  3. Acknowledge retransmissions – 2
- User input on the Control Unit messages -
  1. Maximal number of user inputs in each 100 mS period – 1
  2. Event transmission time - < 3mS
  3. Retransmission interval – 15 mS
  4. Maximum retransmissions in 100 mS period - 7 retransmissions
- Status information is transmitted as part of one of the aforementioned messages.

Hence:

$$DC_{[CU]} = \frac{\left(1_{[heel\,event]} \times 0.003_{[sec/event]} \times 2_{[retransmissions]}\right) + \left(1_{[heel\,event]} \times 0.003_{[sec/event]} \times 7_{[retransmissions]}\right)}{0.1_{[sec]}}$$

$DC_{[CU]} < 27\%$	$20*\log_{10}(DC_{[CU]}) < -11\ dB$

Sincerely,

Amit Dar

R&D and Clinical manager