



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

January 11, 2006

RE: NESS Ltd.

FCC ID: TVF-L300-STM-V10

After a review of the submitted information for FCC, I have a few comments on the above referenced Application.

- 1) Please help clarify the following regarding the manufacturers duty cycle information provided:
 - a) The information mentions 1 gait cycle per second. What controls this? Software? Note that this factor must be device dependent and not user dependent to be effectively controlled.
 - b) The duty factor appears to be based upon a period of 1 second - or a period of the gait. Please note that the duty factor used by FCC is not actual a true duty factor, but worse case duty factor ever seen over any 100 msec period of time the device may transmit. Information provided does not appear to adequately address this fact or look at a worse case 100 msec period of time.
 - c) Information provided for duty cycle and transmissions (heel on – heel off) is more suggestive of the foot sensor relaying only. However the operational description mentions acknowledgements to control unit, transmitting status, relaying status, and relaying information from heel sensor to control unit. How does other types of transmissions factor into transmission intervals? What is the worse case 100 msec TX period expected, given all these different transmission capabilities? Note that it is uncertain if Transmissions are combined, independent, or can occur all together at different intervals. Please provide further information as necessary.

FYI...These types of concerns should be addressed in each of the 3 related applications.

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Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.