March 15th, 2006

NESS L300 Stimulator – Duty Cycle declaration

Federal Communications Commission

7435 Oakland Mills Road

Columbia, MD 21046

We the undersigned, hereby certify that NESS L300 Stimulator's (STM) transmitter (FCC ID: TVF-L300-STM-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 relaying messages -
    1. Maximal number of events in each 100 mS period - 1
    2. Event transmission time - < 3 mS
    3. Retransmission interval – 15 mS
    4. Maximum retransmissions in 100 mS period - 7 retransmissions
- Acknowledging User input on the Control Unit messages –
    1. Maximal number of user inputs in each 100 mS period – 1
    2. Event transmission time - < 2 mS
    3. Number of retransmission – 2
- Status information is transmitted as part of one of the aforementioned messages.

Hence:

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

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

Sincerely,

Amit Dar

R&D and Clinical manager