TRP Inc.

14085 Howard Rd
Dayton, MD 21036

November 5, 2001

Federal Communications Commission
7435 Oakland Mills Rd
Columbia, MD 21046

Re: Medtronic Inc. medical implant programmer/controller Model 9767, FCC ID:LF59767 granted July 2, 1999

Dear Sir or Madam:

Medtronic Inc. herewith submits an application for a Class II permissive change to the equipment covered by the referenced grant. The change request is to include in the referenced equipment the additional capability for communicating using pulse position modulation format. This telemetry mode permits the programmer/controller to communicate with legacy medical implant technologies using unique pulse position modulation formats. No circuitry changes were made to the Model 9767 to implement this modulation mode. This additional modulation capability is provided through software only. As a specialized medical digital device, the emissions from the digital systems that are incorporated in the programmer/controller are exempt from compliance with the specific technical standards of Subpart B of Part 15 pursuant to Section 15.103(e). The accompanying test report show measurement levels in terms of dBuA/m that were made using a loop antenna on a 3 meter range at an FCC listed facility. These measurements were taken using a European Standard, EN 300 330-1, that applies to measurements in this frequency range and are essentially identical to measurement procedures required by the Commission. The AC power line conducted emissions previously measured continue to apply to the Model 9767.

A separate document is being submitted to show the extrapolated radiated values, when converted to dBuV/m, comply with the Section 15.209 of the FCC Rules.

Sincerely,

Phillip Inglis
Consultant to Medtronic Inc.