TÜV America Inc.
1775 Old Highway 8 NW
Suite 104
New Brighton, MN 55112

Phone: (651) 631-2487
Fax: (651) 638-0285
E-mail: info@tuvam.com
www.TUVamerica.com

22 April 2005

RE: Medtronic Inc

FCC ID: LF537751

In response to ATCB comments on the above referenced application.

1. Page C2 of C2 describes the EUT was examined in 3 orthogonal axes. Test setup photographs indicate the worst case configuration.

2. This is an omission in the test report. Peak measurements were made, and were 8 dB higher than the average measurements. Reports will be corrected and resent. Modulation type was Continuous Wave Amplitude Burst Modulation.

3. The patient programmer is the only device that can adjust the pulse width and amplitude of the implantable neurostimulator (INS). The INSR is only able to turn the INS on and off and recharge. Even though the programmer can adjust these parameters, the RF output of the patient programmer isn't affected because it's just commands that are being transmitted from the programmer to the INS. The pulse width and amplitude adjustments are for the implant's therapy stimulation output. It has no bearing on RF output levels.

4. The report has been corrected to 46 dB/decade.

5. ANSI C63.4 procedures are followed - page C2 of C2 describes procedure used.

6. The recharge circuit operates at the 9 kHz frequency, not at 8 kHz as was originally indicated, and the frequencies can not be transmitted simultaneously.

Measurements had been made on the 9 kHz recharge circuit but we had been told that the device operated at less than 9 kHz so had not included the report with the original documents submitted. In addition to the 9 kHz Test Report, the 175 kHz Test Report, Test Setup Photos, Block Diagram, Form 731, RF Exposure Letter, and Technical Description exhibits have been revised accordingly and uploaded at the same time as this correspondence.

Please let us know if you require any further information.

Thank you.

Jolene S Murphy

Jolene Murphy
Senior Technical Writer

jmurphy@tuvam.com