

Marlene H. Dortch
Secretary
Federal Communications Commission
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Dermatology
beyond the skin

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Re: ET Docket No. 19-89 Comment of LEO Pharma, A/S in Support of Massachusetts Institute of Technology Request for Waiver of Part 15 Ultra-Wideband Rules for Witrack Medical Device

Dear Ms. Dortch,

On behalf of LEO Pharma Science & Tech Hub, we support the waiver request as filed by Massachusetts Institute of Technology, asking for relief from the Part 15 rules for ultra-wideband transmitters.

LEO Science & Tech Hub is the United States based R&D innovation unit of LEO Pharma A/S, with its offices in Cambridge, MA. LEO Pharma is a leading healthcare company headquartered in Denmark, which has devoted more than 100 years of research and product development to help people achieve healthy skin. LEO Pharma has a significant presence in the United States, including through its recent acquisition of Bayer's prescription dermatology business, and its investment in pioneering research for dermatology through its LEO Science & Tech Hub. The Hub is exclusively dedicated to identifying, developing, and funding new and innovative skincare and skin treatment solutions. Founded in 2016, the group comprises scientific and technological experts with a vision of how to give patients better control over their skin conditions by diagnosing, predicting, and monitoring these conditions. We are known for our focus on using cutting-edge technology for dermatological applications and have formed multiple collaborations that have explored minimally-invasive biomarker technologies, drug delivery technologies, and advanced imaging technology.

We believe that the MIT Witrack device has significant potential to benefit patients by transforming clinical research and healthcare delivery. The Witrack device has already demonstrated outstanding healthcare related capabilities, such as accurately monitoring the mobility of a person through wireless radio signals, as well as their breathing, heart rate, other vital signs, itching etc.

The Witrack device, with its demonstrated ability to detect and categorize even fine-grained motions, can solve a problem at the core of many skin conditions for patients around the world - itching and scratching. Itching is a severe comorbidity for a variety of skin conditions, most notably eczema/atopic dermatitis, and can lead to a vicious cycle of scratching and inflammation. Eczema is an acutely important problem in America, affecting between 9-18% of children and 3% of adults. Further complicating the issue is that scientists have had a difficult time developing effective drugs to treat it. Because the severity of itching is currently rated by the patient on a 1-10 scale, it is



hard to truly quantify and is entirely subjective. MIT's highly innovative and unique passive remote monitoring device has the potential to remedy this problem.

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The Witrack device enables companies like us to perform better clinical research, understand patient needs, and react to them in a more effective way. Further, it can lead to the validation of a new standard of measurement for itching to be used as an end-point in clinical trials. Such a measurement of itching can also fundamentally change the way in which doctors manage skin conditions by allowing them to monitor their patients' condition and adjust medication dosage and regimen on an individual basis. The net result will be a significant improvement in the health outcomes and quality of life for a large population - over 10 million children, and 7 million adults.

In conclusion, we support the request for waiver by Massachusetts Institute of Technology referred to in ET-Docket DA 19-230. We believe the unique Witrack technology will contribute to the overall health of patients with eczema and other skin conditions.

Yours sincerely,

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