

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
International Bureau Seeks Comment on)	IB Docket No. 15-289
Removing Cuba from the Exclusion List)	

COMMENTS OF MEDTRONIC, INC.

I. INTRODUCTION

Medtronic, Inc. (“Medtronic”) is pleased to provide these comments in support of the Commission’s proposal to remove Cuba from the Exclusion List for International Section 214 Authorizations (“Exclusion List”) consistent with the Department of State’s recommendation.¹ By removing Cuba from the Exclusion List, the Commission will advance the public interest by making it easier for U.S. based facilities carriers to initiate service to Cuba.

Medtronic is an internationally recognized pioneer and leader in the development of numerous medical devices such as cardiac pacemakers, defibrillators, infusion pumps, and neural stimulators.² Medtronic’s mission involves identifying new ways to enhance global healthcare, primarily by improving lives through its medical technologies and solutions. As part of this mission, Medtronic creates a variety of sophisticated medical devices and services that rely on communications capabilities. Many of these devices, for example, allow physicians to download data seamlessly from implanted devices to serve better the healthcare needs of patients. These devices have played a transformative role in medicine, providing “benefits to patients in terms of

¹ *International Bureau Seeks Comment on Removing Cuba from the Exclusion List*, Public Notice, IB Docket No. 15-289 (Nov. 24, 2015) (“Public Notice”).

² Medtronic, Inc., based in Minneapolis, Minnesota, is a subsidiary of Medtronic plc. For more information please visit the link: www.medtronic.com

mobility and comfort” while also significantly “reducing healthcare costs.”³ By making it easier for U.S. carriers to provide facilities-based telecommunications services from the United States to Cuba, the Commission will be taking yet another step to global implementation of medical technology that relies on communications to leverage the capabilities of physicians and to enhance the lives of patients. In short, removing Cuba from the exclusion list will promote the public interest.

The proposed action will eliminate obstacles that currently impede carriers’ ability to implement circuits between the United States and Cuba.⁴ In particular, U.S. international carriers would no longer be required to request specific authority to provide facilities-based telecommunications services from the United States to Cuba; rather, authority for the U.S-Cuba route would be included in a global facilities-based Section 214 authorization.⁵ Further, carriers that already hold global Section 214 authorizations would automatically be able to provide telecommunications services from the United States to Cuba.⁶

As the State Department notes, removing Cuba from the Exclusion List will yield several benefits, including “creat[ing] more opportunities” within the United States and Cuba, and enhancing “the free flow of information to, from, and among the Cuban people.”⁷ Specifically, removing Cuba from the Exclusion List and promoting open communications between the

³ *Amendment of Parts 2 and 95 of the Commission’s Rules to Create a Wireless Medical Telemetry Service*, Order, 16 FCC Rcd 4543, 4543 ¶ 2 (2001).

⁴ *See* Public Notice at 2.

⁵ *Id.*

⁶ *Id.*

⁷ Letter from Ambassador Daniel A. Sepulveda, U.S. Coordinator for International Communications and Information Policy, U.S. Department of State, to Thomas Wheeler, FCC Chairman, DA 15-1274 (Oct. 26, 2015).

United States and Cuba will facilitate the use of modern medical technology by Cubans and those who travel to Cuba. Making it easier for carriers to obtain authority to implement circuits to Cuba will promote connectivity for medical devices and services including advancements in medical technology, such as remote monitoring of medical devices, to be used by Cubans and travelers visiting the country and vice versa. At the same time, the increase in circuits between the United States and Cuba will allow for a more robust exchange of medical information between the two countries.

In summary, removing Cuba from the exclusion list will advance the national interest in strengthening the free flow of telemedicine information and will help to bring innovative medical technology to the Cuban people. With these important benefits at stake, Medtronic submits that the Commission should remove Cuba from the Exclusion List, consistent with the State Department's recommendation.

Respectfully submitted,

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Dated: December 4, 2015