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September 25, 2007

By Electronic Filing

Ms. Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ET Docket Nos. 06-135 & 05-213 and RM-11271
Ex Parte Presentation

Dear Ms. Dortch:

Biotronik, Inc. ("Biotronik") hereby submits for the record of this proceeding a technical paper that states the benefits of allowing low-power, low duty-cycle ("LP-LDC") access of implantable medical devices at the center of the MICS band.[1]

The paper was presented by Biotronik engineers in August at the annual conference of the Institute of Electrical and Electronics Engineers, Inc. ("IEEE"), Engineering in Medicine and Biology Society ("EMBS"), the largest association of international biomedical engineers, after being approved by the IEEE's peer-

[1] Brian Sutton et al., *Probability of Interference between LP-LDC and LBT MICS Implants in a Medical Care Facility*, Proceedings of the 29th Annual International Conference of the IEEE EMBS, 6721-6725 (Aug. 23-26, 2007) (attached).

review process.[2] It examines the probability of interference between LP-LDC and listen before transmit ("LBT") medical implant devices located in the same medical care facility, using the SEAMCAT-3 modeling tool. The study concluded that these devices can safely coexist in many environments – a crowded waiting room, side-by-side doctors' offices – with an extremely low probably of interference.

In sum, the study supports Biotronik's previous statements that its suggested modification to the MICS rules, as previously submitted to the Commission, will not create undue risk of interference among MICS devices.[3]

Please direct any questions to the undersigned.

Sincerely,

Henry Goldberg
Attorney for Biotronik, Inc.

cc: Julius Knapp
Bruce Romano
Alan Stillwell
Geraldine Matise
Jamison Prime
Gary Thayer
Mark Settle

Attachment

[2] The paper was reviewed by a minimum of four technical experts on the EMBC Selection Committee. Their comments and critiques were incorporated. The paper was then published and presented at the conference in Lyon, France.
[3] *See Letter from Henry Goldberg, Attorney for Biotronik, Inc., to Marlene Dortch, Secretary, Federal Communications Commission*, Attachment A (May 23, 2007) ("Biotronik Presentation") (outlining Biotronik's present proposal for MICS rule changes).