



August 11, 2009

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Amendment of Parts 2 and 95 of the Commission's Rules to Provide Additional Spectrum for the Medical Device Radiocommunication Service in the 413-457 MHz Band (ET Dkt. No. 09-36; RM-11404)

Dear Ms. Dortch:

I am submitting these comments to urge the Commission to adopt rules permitting the operation of medical micro-power network ("MMN") devices in the 413-457 MHz band.

I am a Senior Scientist with Greatbatch Medical and have been working in the area of implantable medical devices for over 34 years. Greatbatch manufactures components and circuits for a wide range of pacemakers, implantable cardioverter defibrillators and neurostimulators. I am also the chairman of the AAMI Cardiac Rhythm Device Committee (formerly the Pacemaker Committee) and am also a member of the AAMI Neurostimulator and Drug Pump Committees. I am also a U.S. Expert delegate to ISO representing the United States on International Standards Organization committees including: Pacemaker, Neurostimulator, Drug Pump and MRI Committees.

I am familiar with the MMN devices that the Alfred Mann Foundation is developing, and I believe that these devices, if allowed to operate, will provide invaluable health benefits to millions of people suffering from paralysis and other debilitating conditions. Specifically, these MMN devices are designed to operate as an artificial nervous system to restore sensation, mobility, and other functions to paralyzed and paretic limbs and organs. They can be used to treat a broad range of injuries and conditions, including severe spinal cord and brain injuries, debilitating disorders such as cerebral palsy and osteoporosis, and more common afflictions such as arthritis and headache.

Unlike any other medical treatment option available today, MMN devices offer a novel wireless solution that addresses the significant limitations in the previously available technologies. They provide a safer, less invasive, more convenient, and more effective treatment option than existing alternatives.

Because the benefits offered by MMN devices are immeasurable and cannot be replicated by other existing technologies, I urge the Commission to act expeditiously to adopt the rules necessary to foster the development of this extraordinary technology.

Sincerely,

/s/ Robert A. Stevenson, PE

Prof. Robert A. Stevenson, PE
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