

October 1, 2012

FCC ID: B8OVRB101

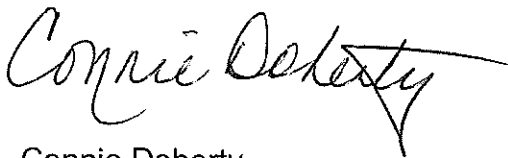
To whom it may concern:

We hereby declare the VRB101 worst case normal transmit time is 30sec which is restricted by software not exceed this given duration. The maximum data transmission occurs during the 30 second transmission.

The device repeats or retries the transmission in a 10 minutes (600 second) interval which is controlled and restricted by manufacturer coded firmware. This is the cases for both GSM operating frequencies (GSM850 and PCS1900) bands. Access to the device firmware is not accessible by user and therefore cannot be changed by the user of the device.

The maximum worst case duty factor of the transmission is 0.0125 (1.25%) and the device is incapable of transmitting higher than this duty factor.

Yours sincerely,



Connie Doherty
Chief Financial Officer

VINVOX INTERNATIONAL CORP.