



December 12, 2013

Ms. Michelle Branum
CKC Certification Services
5046 Sierra Pines Dr
Mariposa, CA 95338

Dear Ms. Branum:

Following is an application package for FCC certification of the Argus II Retinal Prosthesis System. Argus II is a medical device that is used to provide electrical stimulation of the retina to induce visual perception in blind patients.

The system contains both an implanted component and external components. The implant is a neurostimulator that consists of a hermetic electronics module, an electrode array, and a coil antenna by which it receives power and data from the external component. The implant includes a back telemetry transmitter that operates at 480kHz, but it qualifies for exemption from certification under 15.201.

Argus II's external components include a DSP-based video processor unit (VPU) and an RF module that may be attached to a pair of glasses or may be used alone to test the implant during implantation surgery. The electronics circuit card assembly, coil antenna, and housings are identical for the two applications, but the glasses model has an attached video camera and a short cable for connection to the video processor unit. The operating room model has no camera attached, and the cable is longer and includes a ferrite for EMI suppression.

The VPU is battery powered. It receives input from the video camera on the glasses and creates from it a data stream that modulates a 3.156MHz carrier that is inductively coupled to the implant. This signal supplies power to the implant and controls the outputs of the neurostimulator to provide visual patterns corresponding to the camera image. Second Sight has applied for and received a waiver to 15.209 from FCC that allows a higher level of emissions at that frequency. A copy of the waiver is attached.

Argus II is excluded from routine environmental evaluation (EA) for RF exposure prior to equipment authorization or use, except as specified in 1.1307(c) and 1.1307(d). FCC has requested and we have provided SAR evaluation for the 3.156MHz transmitter. The 480kHz transmitter is exempt from SAR evaluation per 15.201.

The application package includes a technical report conforming to 2.1033(b) with the required attachments. We will provide any additional documents you require.

Regards,

A handwritten signature in black ink, appearing to read "James S Little".

James S Little
VP, R&D