

July 18, 2006

Mr. James R. Burtle, Chief
Experimental Licensing Branch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Gentlemen:

Pursuant to Sections 0.459(b) of the Commission's Rules, Medtronic Incorporated (Medtronic) hereby requests confidential treatment of information accompanying their submission of a request for an experimental license. In response to the requirements of 0.459(b) of the Rules, Applicant submits the following:

- 1. Identification of the specific information for which confidential treatment is sought:**
Medtronic requests the information disclosed in EXHIBIT 1 of their application for an experimental license be kept confidential including correspondence that discloses information presented in Exhibit 1.
- (2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:**
Medtronic's application for an Experimental License (Form 442 File Number 0443-EX-PL-2006).
- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:**
The request for confidentiality pertains to information which addresses both commercial and trade secret concerns.
- (4) Explanation of the degree to which the information concerns a service that is subject to competition:**
The information disclosed in EXHIBIT 1 concerns the development of numerous therapeutically unique implantable devices as well as ongoing research to improve the efficacy of existing devices for the medical electronics industry. This industry is highly competitive, and developing products for this industry involves a substantial degree of financial investment and financial risk.
- (5) Explanation of how the disclosure of the information could result in substantial competitive harm:**
Disclosure of Medtronic's intention to perform research projects as disclosed in EXHIBIT 1 will inform our competitors of the company's interest in certain market segments and future business strategy.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

Medtronic maintains Non-Disclosure Agreements (NDA's) with all participants in the proposed research project as well as vendors supplying equipment related to the proposed research project.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

As of this date, no information related to the nature of the various proposed research projects have been made available to the public by Medtronic. Any disclosures to third parties are protected by NDA's.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

Medtronic requests the material be withheld from public disclosure for a period of 5 years (3 years to conduct the research, plus an additional 2 years to commercialize the product). This period will provide Medtronic suitable time to develop the product for sale in the market.

(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:

None.

The public disclosure of the information in Exhibit 1 would be harmful to Medtronic and provide unjustified benefits to its competitors.

Sincerely,

Phillip Inglis
Consultant to Medtronic