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September 23, 2019

Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, Maryland 21046

Re: Request for confidentiality
Applicant: Starkey Laboratories, Inc. DBA Starkey Hearing Technologies
FCC ID: EOA-24LIVIORCHG

To whom it may concern,

Permanent Confidentiality

Request is hereby submitted by Starkey Laboratories, Inc. DBA Starkey Hearing Technologies to withhold permanently from public review certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept permanently confidential:

- Detailed Operational/Functional Description

Rationale for request for confidentiality:

Starkey Laboratories, Inc. DBA Starkey Hearing Technologies has invested considerable time and materials in research and development to produce the referenced product. Disclosure of the permanently confidential portions of this application to competitors would not only give them significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by us. Disclosure of the short-term confidential portions of this application during the period of importation and/or distribution would reveal key aspects of proprietary technology to competitors and diminish the value of our investment in research and development.

Sincerely,

A handwritten signature in black ink that reads "William J. Mitchell". The signature is written in a cursive, flowing style.

William J. Mitchell, PE
Principal Regulatory Affairs Engineer
Starkey Laboratories, Inc.
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