Boston Scientific
Advancing science for life™

26 February 2020

Federal Communications Commission
Office of Engineering and Technology
7435 Oakland Mills Road
Columbia, Maryland 21046

We, Cardiac Pacemakers, Inc. (a wholly owned subsidiary of Boston Scientific Corporation), located at 4100 Hamline Avenue North, Arden Hills, MN 55112-5798, hereby respectfully request that under the provision of section 0.457(d) and 0.459 of the FCC Rules, the documents listed below and attached with this application for certification be provided with confidential status.

- Schematics
- Operational Description
- Frequency Block Diagram
- Internal Photos

Any exhibit/information for which we have requested confidentiality, but which may not be accorded such treatment by the FCC, should be returned to us.

The documents listed above contain trade secrets and proprietary information that are not customarily released to the public. This information is highly confidential and pertains to the design and manufacture of implanted medical devices, which are regulated by the FDA. The public disclosure of this information could result in substantial competitive harm to us and unjustified benefits to our competitors. For at least these reasons, we are requesting the confidential treatment of this information.

Concerning the Internal Photos, our request for confidentiality is based on consideration of criteria in FCC KDB 726920 D01, section II.(3). Specifically:

- The circuit board and internal components of the device are not accessible to users. They are contained in a welded titanium and hermetically sealed enclosure with epoxy over-mold. The device is implanted in the human body.

- The circuit board and internal components are not accessible to the public. Access to the circuit board and internal components would cause irreparable damage to the device and prevent its intended medical use.

- The circuit board and internal components are not accessible to professional medical clinicians qualified to service the device. Access to the circuit board and internal components would cause irreparable damage to the device and prevent its intended medical use.

- This is a medical device regulated by the U.S. Food and Drug Administration (FDA) and is only available through qualified physicians by prescription.

Sincerely,

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James Kippola
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Rhythm Management
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