Medtronic

Minimally Invasive Therapies Group
Patient Monitoring & Recovery
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USA
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Equipment Authorization Branch
Federal Communications Commission
Columbia, MD 21046

Re: Medtronic, Inc.
Request For Permanent Confidentiality
FCC ID No.: LF5-OS1E100

Ladies and Gentlemen:

Medtronic, Inc. ("Medtronic") requests that the information contained in the items enumerated below pertaining to the above-referenced application be withheld from public disclosure in accordance with Commission's Rules 47 C.F.R. § 0.459 and 0.457, following grant of the application. In support of this request, Medtronic submits the following:

(1) Identification of the specific information for which confidential treatment is sought:

The materials set forth in these exhibits, which are segregated from the nonconfidential exhibits of the application, are those for which confidentiality is sought:

- Exhibit _5_: Schematics
- Exhibit _6_: Block Diagram
- Exhibit _3_: Bill of Material
- Exhibit _4_: Theory of Operation / Operational description

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The proceeding is that involving the certification of FCC ID No.: LF5-OS1E100

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

These exhibits include circuit diagrams, detailed technical explanations, parts lists, a block diagram and internal photographs of a sophisticated medical device. As such, this material is treated as highly confidential business information and information that could convey trade secrets pertaining to manufacturing and design techniques.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

The information for which confidentiality is sought is employed in the design and manufacture of medical device systems that are offered on a highly competitive basis. Customers for this equipment have a variety of competing sources of supply from both domestic and foreign suppliers.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure would, in effect, give away the fruits of the labors of Medtronic's engineering personnel, who have designed the device and the manufacturing processes. Disclosure would also offer competitors insight into the state of product development at Medtronic, thereby allowing such competitors an unwarranted advantage.

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

The information for which confidential treatment is sought is kept confidential by Medtronic pursuant to document tracking and controls, limited internal distribution, and employment agreements that obligate employees to maintain technical information confidential. The information is not made available to third parties except pursuant to contractual confidentiality obligations to prevent public disclosure.

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

To the knowledge of those preparing this application, the information has not been previously disclosed publicly. The protection sought is narrowly drawn to the particular technologic implementations disclosed in the exhibits identified above.

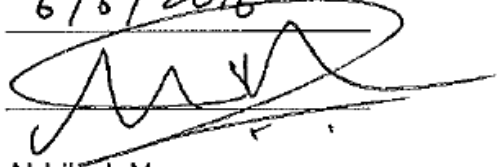
(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

This material should not be disclosed for at least five years. Disclosure of the information would lead to insights into both designs and manufacturing techniques and could have an adverse competitive effect for many years to come. This application contains information that may be used in future applications for similar devices.

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

The communications aspects of this device are employed in the transmission of highly private medical information about patients that are being actively monitored within a clinical setting. As such, it is important that information pertaining to the design and operation of this device is not be made available to unauthorized persons who might attempt to use that knowledge to compromise the security and privacy of the transmitted medical information.

Dated: 6/6/2016

Signature: 

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