

Medtronic

Minimally Invasive Therapies Group

Patient Monitoring & Recovery
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Boulder, CO 80301
USA
www.medtronic.com

Equipment Authorization Branch
Federal Communications Commission
Columbia, MD 21046

Re: Medtronic plc
Request For Short-Term Confidentiality
FCC ID No.: LF5-OS1E100

Ladies and Gentlemen:

Medtronic plc ("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, for a maximum of 180 days or until the product is offered for sale, whichever comes first. 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 short-term confidentiality is sought:

- Exhibit _2_: External photos
- Exhibit _8_: User Manual
- Exhibit _1_: Internal Photos

(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 technical details about a sophisticated medical device that is not yet on the market. In the short-term, before the device is available for sale, advanced disclosure of these materials would convey confidential business information, and information about Medtronic's internal research and development efforts. These materials will become available to the public when Medtronic makes the device available for sale, following grant of this application.

(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 of these materials before the product is available for sale would offer competitors advance 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:

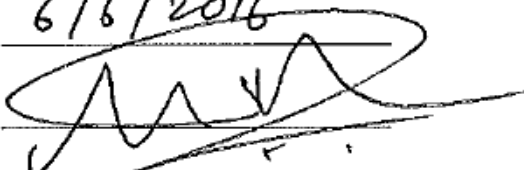
To the knowledge of those preparing this application, the information has not been previously disclosed publicly. The protection sought is narrowly drawn to the particular technologic implementations disclosed in the exhibits identified above.

(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 180 days or until the product is offered for sale, whichever comes first. This period of time is the expected amount of time that Medtronic will need in order to complete its internal research and development of this new device, and begin public announcements. Disclosure of this information before this date would offer competitors advance insight into the state of product development at Medtronic, thereby allowing such competitors an unwarranted advantage

(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.

Dated: 6/6/2016
Signature: 
Name: Abhilash Menon
Title: Manager, Software Engineering | R&D