

September 6, 2022

Equipment Authorization Branch
Federal Communications Commission
Columbia, MD 21046

Re: Medtronic, Inc.

Request For Long Term Confidentiality
FCC ID No.: LF597800
Model: 97800

Good day:

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 Section 0.459 of the Commission's Rules, 47 C.F.R. § 0.459 (2001) and 726920 D01 Confidentiality Request Procedures v01r02, following grant of the application. The requested materials for confidential treatment as set forth in these exhibits are segregated into long term and short-term confidential exhibits of the application are those for which confidentiality is sought.

Model 97800 is implanted in a human body therefore not accessible and not retail to the general public as they follow FDA regulation to be sold under prescription and/or health care specialist specific licenses. The Model 97800 is also inaccessible to the radio parts as the entire circuit including the antenna is inside the human body and then encapsulated in a welded titanium enclosure and under specific vacuum and gas filler and parts epoxy in the can.

Short term confidentiality for a period of 180 days is requested for the following exhibits:

None.

(1) identification of the specific information for which long term confidential treatment is sought:

Schematics
Block Diagram
Operational Description
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 application for equipment authorization (certification) under FCC ID No.: LF597800

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

This information is embodied in circuit diagrams, detailed explanations, a block diagram of a device designed for implantation in patients and/or use by authorized medical professionals that are contractually precluded from disclosing such information from third parties. 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 devices 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 equipment and the manufacturing processes. Disclosure would also offer competitors additional unwarranted insight into the state of product development thereby allowing such competitors an advantage that would not be available to Medtronic.

(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 and not made available to third parties except pursuant to arrangements designed to prevent public disclosure. This device is not retail to public and is implanted in the body by trained physician (FCC KDB 726920 II.3. a) & c)). Model 97800 is implanted in a human body therefore not accessible and not retail to the general public as they follow FDA regulation to be sold under prescription and/or health care specialist specific licenses. The Model 97800 is also inaccessible to the radio parts as the entire circuit including the antenna is inside the human body and then encapsulated in a welded titanium enclosure and under specific vacuum and gas filler and parts epoxy in the can.

(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 disclosed publicly heretofore. The protection sought is narrowly drawn and pertains to certain specific implementations of the technology incorporated into the device for which certification is sought.

(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 ten years. While improvements in design are likely to be made during this period, disclosure of the design 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 will be used in future applications for similar devices. Moreover, the communications aspects of this device are employed in the programming of medical implant devices and in the transmission of highly private medical information. Disclosure of the information for which confidentiality is sought could jeopardize the protection of such personal private medical information generated for the benefit of patients into whom a device has been implanted. As such, it is important that

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information pertains to the design and operation of this device not be made available to unauthorized persons who might attempt to use knowledge of the design to compromise the applications for which the equipment will be employed.

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

See item 8 above. Note that the equipment for which approval is being sought will be employed in applications that inherently carry a premium on security.

Respectfully,

A handwritten signature in black ink, appearing to read 'GG', with a large, sweeping underline.

Guillaume Girard
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