Medtronic

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February 27th, 2023

Equipment Authorization Branch
Federal Communications Commission Columbia, MD 21046

Subject: Confidentiality Request Letter pertaining to the Class II Permissive Change Request of FCC ID No: LF5BLEIMPLANT4

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. § 0.457(d) and 0.459, following grant of the application.

The confidential information is embodied in circuit diagrams, detailed explanations, parts lists, and internal photographs of devices designed for patients under the care of a medical professional. As such, this material is treated as highly confidential business information and information that could convey trade secrets pertaining to manufacturing and design techniques. 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. 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.

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. To the knowledge of those preparing this application, the information has not been

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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.

Long-Term Confidentiality

The materials set forth in the following exhibits, which are segregated from the non-confidential exhibits of the application, are the ones for which Medtronic requests Long-Term Confidentiality:

- Internal Photos
- Schematics
- Theory of Operation / Operational description
- Parts list

Following the Equipment Authorization Confidentiality Request Procedures as described in KDB Guidance 726920 D01, Internal Photos may be held Long-Term Confidential under the condition that the circuit board or internal components are not accessible to users.

Medtronic's implantable devices, which are the subject of this filing, are not available to the public. The devices are Class 3 devices regulated by the FDA and are available by prescription only by health care professionals. As the devices are sealed by a titanium enclosure, opening the device is not possible. Therefore, the equipment to which this Long-Term Confidentiality request pertains satisfies this criterion.

Sincerely,

Medtronic, Inc.
Department of

Christiaan Masson
Regulatory Affairs Manager
Cardiac Rhythm Management