

November 13, 1998

Federal Communications Commission  
Washington, D.C.

Subject: Request for Confidentiality Under 47 CFR §§0.457 and 0.459

Reference: Form 731 Confirmation Number: EA92284  
FCC ID: N9Y0007

Dear Sir or Madam:

Applicant hereby requests confidentiality of the following documents submitted with the application for certification referenced above which is being filed electronically:

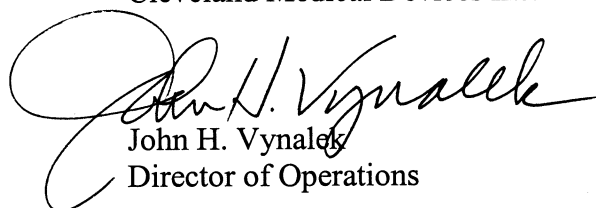
Exhibit G Block Diagram of Circuit with Operational Description  
Exhibit H Circuit Schematics

These documents contain novel, proprietary and confidential technical information having substantial commercial value to the Applicant and are, therefore, trade secrets of the Applicant. As such, the information is not publicly known and Applicant has not otherwise publicly disclosed the information. Section §457(d)(2) supports this request in that it directs non-disclosure of such information by the Commission, to wit:

“...If it is shown in the request that the materials contain trade secrets or commercial, financial or technical data which would customarily be guarded from competitors, the materials will not be made routinely available for inspection...”

Applicant has marked these documents as confidential pursuant to the instructions for electronically filing. In addition, Applicant is taking and will take any and all measures allowed to assure that this information is kept proprietary to Applicant, including measures to preclude reverse-engineering. Disclosure by the Commission will severely compromise Applicant's ability to continue to keep the information proprietary and protect its intellectual property and will damage and/or destroy Applicant's commercial opportunities therewith.

Sincerely,  
Cleveland Medical Devices Inc.

  
John H. Vynalek  
Director of Operations