

Date: 18-JAN 2023

Subject: Confidentiality Request for FCC ID: PX2- GMCHG1

Pursuant to FCC 47 CFR 0.457(d) and 0.459 and IC RSP-100, Section 10, the applicant requests that a part of the subject FCC/IC application be held confidential.

Type of Confidentiality Requested		Exhibit
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	All Block Diagrams
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Bill of Materials
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	External Photos
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	Test Setup Photos
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Internal Photos
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Operation Description/Theory of Operation
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	All Schematics
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	User's Manuals
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Assembly Drawings

Abbott Neuromodulation has spent substantial effort in developing this product that showcase significant features and improvements from current products. Having the subject information easily available to "competition" would negate the advantage they have achieved by developing this product. Not protecting the details of the design will result in financial hardship. The applicant also requests permanent confidentiality for internal photos as allowed by KDB 726920 Section II.3. The circuitry is not accessible to the user and will be permanently housed in a hermetically sealed enclosure created by an ultrasonic weld that is equivalent or better than epoxy.

Permanent Confidentiality:

The applicant requests the exhibits listed above as permanently confidential be permanently withheld from public review due to materials that contain trade secrets and proprietary information not customarily released to the public.

Short-Term Confidentiality:

The applicant also requests that the exhibits listed above as short term confidential be withheld from public view for a period of 180 days from the date of the Grant of Equipment Authorization and prior to marketing. This is to avoid premature release of sensitive information prior to marketing or release of the product to the public. Applicant is also aware that they are responsible to notify Element in the event information regarding the product or the product is made available to the public. Element will then release the documents listed above for public disclosure pursuant to FCC Public Notice DA 04-1705.

Sincerely,

By: _____

Director, Regulatory Affairs

Manasi Khare

(Print name)