



**Neuromodulation**

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April 2, 2020

Federal Communications Commission  
Authorization and Evaluation Division  
7435 Oakland Mills Road  
Columbia, Maryland 21046

Re: Request for Confidentiality  
FCC ID: Q4D-SC1232

To whom it may concern,

We hereby respectfully request that under the provision of 47 CFR 0.459 and 0.457 (d), the documents listed below and attached with this application for certification be provided with confidential status.

**Long Term Confidentiality Status**

- Schematics
- Operational Description
- Frequency Block Diagrams
- Internal Photos

The documents listed above contain trade secrets and proprietary information that are not released to the public. The public disclosure of these materials may be harmful to us and provide unjustified benefits to our competitors.

Concerning the Internal Photos, our request for confidentiality is based on consideration of criteria in FCC KDB 726920 D01, section II.(3). Specifically:

- The circuit board and internal components of the device are not accessible to users. They are contained in a welded titanium and hermetically sealed enclosure with epoxy over-mold. The device is implanted in the human body.
- The circuit board and internal components are not accessible to the public. Access to the circuit board and internal components would cause irreparable damage to the device and prevent its intended medical use.
- This is a medical device regulated by the U.S. Food and Drug Administration (FDA) and is only available through qualified physicians by prescription.

**Short Term (180 day) Confidentiality Status:**

- External Photos
- Directions For Use/Manuals
- Test Setup Photos

Any exhibit / information for which we have requested confidentiality, but which may not be accorded such treatment by the FCC, should be returned to us.

The documents listed above contain trade secrets and proprietary information not customarily released to the public. The public disclosure of these materials may be harmful to us and provide unjustified benefits to our competitors.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kaoru Lee Adair", with a long horizontal flourish extending to the right.

Kaoru Lee Adair

Vice President, Clinical and Regulatory Affairs