

Federal Communications Commission  
Equipment Authorization Branch  
7435 Oakland Mills Road  
Columbia, MD 21046

7 July 2009

**Request for Confidentiality**

**Company name:** Biotronik  
**FCC ID:** QRI PRIMUS  
**FCC Part 15 Certification**

Gentlemen,

In accordance with 0.459 of CFR 47, Biotronik hereby requests confidentiality of the following attachments:

- Antenna Description
- Internal Photographs
- Block Diagrams
- Circuit Description
- Schematics
- Parts List

These documents contain detailed system and equipment description and related information about the product which Biotronik considers to be proprietary, confidential and a custom design and otherwise would not release to the general public. Since the design is a basis from which future technological products will evolve, Biotronik considers that this information would be of benefit to its competitors and that the disclosure of the information in these documents would give competitors an unfair advantage in the market.

The internal photos will also reveal information about non-radio design elements that are also Biotronik proprietary design and if disclosed could result in substantial competitive harm. The Primus devices are implantable pacemakers. These devices are not allowed (by law) to be sold in a store or pharmacy to the public. Therefore it is not possible to buy such a device publically. A Biotronik representative usually participates during the operation and in most cases brings the device with him to the operation. Until operation / implantation, the device is stored in a non re-sealable semi-opaque sterile container. Any damage of the container before implantation would be noticed and the device could not be used for implantation. The housing of the device itself is made of titanium and fully laser welded. It is not possible to open the device without destroying it. There, before implantation, it is impossible that somebody outside Biotronik personnel has the opportunity to open the device in order to get the information Biotronik requests to be held confidential. After implantation, the device can only be removed from the patient by an operation in a hospital.

Sincerely,



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Andreas Gute  
Program Manager  
Biotronik  
6024 SW Jean Rd.  
Lake Oswego, OR 97035 USA