

July 5, 2009

**VIA ELECTRONIC FILING**

Equipment Authorization Branch  
Federal Communications Commission  
Columbia, MD 21046

Reference: Cochlear Limited  
Request For Confidentiality  
FCC ID: WTOCP81000

Regarding: Further justification for confidential treatment of internal photos

Gentlemen:

Cochlear Limited via letter dated June 9, 2009 requested that internal photos for the referenced device be permanently withheld from public disclosure in accordance with Section 0.459 of the Commission's Rules, 47 C.F.R. § 0.459 (2001), following grant of the application. These photos reveal information such as chip numbers, design circuit and antenna information, etc., that is considered to be proprietary by Cochlear Limited.

In an effort to maintain confidentiality of the internal circuits of these units, Cochlear fuses the outer shell together into a single enclosure at the time of manufacture that cannot be opened without destroying the unit. Further, Cochlear warns the users that any attempt to open the unit will destroy the internal circuits and void the warranty.

Based on the above declarations, Cochlear has met the criteria specified by the FCC to maintain permanent confidential treatment of the internal photos of the equipment identified above.

Respectfully,



Phillip Inglis  
Consultant for Cochlear Limited