

June 20, 2024

Office of Engineering and Technology Laboratory Division
7435 Oakland Mills Rd
Columbia MD 21046-1609

Subject: Confidentiality Request Under Exceptional Circumstance
Reference FCC ID: 2AAZF-ACCRX02

To whom it may concern:

Per Section IV, 2) of FCC KDB 726920 D01, Intuitive Surgical Inc. is requesting confidentiality under an exceptional circumstance. The exhibits are currently available for public inspection as the equipment has been granted approval, but the exhibits qualify for Long-Term Confidentiality.

Pursuant to the provisions of Sections 0.457(d) and 0.459 of the Commission's rules (FCC 47 CFR §§ 0.457(d) and 0.459), Intuitive Surgical Inc. hereby requests for confidential treatment for exhibits filed with the Commission, in connection with the application for equipment authorization reference above.

Long-Term Confidentiality

Intuitive Surgical Inc. requests that the Commission withhold the following exhibits from public viewing indefinitely:

- User Manual – Installation instructions 01
- User Manual – Installation instructions 02
- User Manual – installation instructions 03

The public disclosure of these materials may be harmful to Intuitive Surgical Inc. and provide unjustified benefits to its competitors.

Per FCC KDB 726920 D01, the user's manual may be held confidential only when the manual contains proprietary technical information intended for professional technicians obligated under an NDA and all sales and distribution of the user's manual must be under an NDA that restricts the disclosure of the information. The modular equipment in connection with the application for equipment authorization, will only be installed in host systems manufactured by Intuitive Surgical Inc. Therefore, the user manual is intended for technical professionals employed by Intuitive Surgical Inc., who are bound to confidentiality and non-disclosure of such material.

Intuitive, the Grantee, acknowledges that applicable exhibits were public records. Intuitive recognizes that third-party websites may have obtained the information during the period the information was public and understands the FCC has no control over the information on non-FCC websites.

Sincerely,



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