

# ALGOSTIM,LLC

April 8, 2014

Federal Communications Commission  
Office of Engineering and Technology  
7435 Oakland Mills Road  
Columbia, Maryland 21046

Re: Request for Confidentiality of Medical Implant Transceiver Application, FCC ID:  
2ABU824082412

Dear Sir or Madam:

## **Permanent Confidentiality**

Algostim, LLC ("Algostim") hereby requests that the Federal Communications Commission ("FCC") withhold permanently from public review certain portions of Algostim's application for certification with FCC identifier 2ABU824082412. Public disclosure of these portions of the application would not only provide Algostim's competitors significant competitive advantages in developing similar products, but it would disclose successful implementation of unpublished, leading edge technology developed by us.

This request for confidentiality is made pursuant to 47 CFR 0.457(d)(2) and 0.459 of the FCC's rules. Algostim requests that the following documents, submitted in connection with its application for certification with FCC identifier 2ABU824082412, be kept permanently confidential:

1. Schematics
2. Block Diagram
3. Internal Photos
4. Operational Description
5. Tune-Up Procedure

The materials listed above contain technical data, which would customarily be guarded from competitors. In addition, Algostim is requesting that the internal photos within the application be granted confidentiality, because only personnel authorized by Algostim have access to this information. The Algostim implantable medical device is a sterile, sealed device designed for implantation in humans. The device is professionally installed and only personnel authorized by the manufacturer have access to the device. As such, the internal photos are highly confidential business information that could convey trade secrets pertaining to manufacturing and design techniques.

We understand that internal photos are not routinely held confidential. However, we request confidentiality pursuant to KDB 726920 D02 v02, item c: "Internal photos of a consumer device may be held confidential when the circuit board is enclosed in epoxy or in a material that would destroy the circuit board if removed, or if the **device is sealed and disassembly would destroy the product.**" The Model 2408/2412 circuit board is enclosed within the hermetically sealed device. The device enclosure is made of titanium and any attempt to disassemble the device would be destructive to the device enclosure and components. This request for confidentiality of internal photos is similar to other medical implant manufacturers, who have been afforded permanent confidentiality of internal photos.

## **Short-term Confidentiality**

Algostim hereby requests that the FCC withhold from public review for a period of 45 days from the date of the Grant of Equipment Authorization, certain portions of Algostim's application for equipment certification with the FCC identifier 2ABU824082412. Public disclosure of the short-term confidential portions of this application during the period of importation and/or distribution would reveal key

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aspects of the product design to Algostim's competitors and diminish the value of Algostim's investment in research and development.

This request for confidentiality is made pursuant to 47 CFR 0.457(d)(2) and 0.459 of the FCC's rules. Algostim requests that the following documents, submitted in connection with its application for certification with FCC identifier 2ABU824082412, be kept confidential for a period of 45 days from the date of the Grant of Equipment Authorization:

1. User Manual
2. External Photos
3. Test Set-Up Photos

Please do not hesitate to contact me at (763) 404-7553 if you would like to discuss this matter.

Sincerely,

*Bernard Bosley 4/8/2014*

Bernard Bosley  
Quality Systems Director  
Algostim, LLC

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Phone: 763.404.7553