

# Nuvectora

August 30, 2019

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

Re: Request for Confidentiality of Nuvectora Bridge Communicator,  
FCC ID: 2ABU84110-US

Dear Sir or Madam:

## **Permanent Confidentiality**

Nuvectora Corporation hereby requests that the Federal Communications Commission ("FCC") withhold permanently from public review certain portions of Nuvectora's application for certification with FCC identifier 2ABU84110-US. Public disclosure of these portions of the application would not only provide Nuvectora Corporation's competitors significant competitive advantages in developing similar products, but it would disclose successful implementation of unpublished, leading edge technology developed by Nuvectora Corporation.

This request for confidentiality is made pursuant to 47 CFR 0.457(d)(2) and 0.459 of the FCC's rules. Nuvectora Corporation requests that the following documents, submitted in connection with its application for certification with FCC identifier 2ABU84110-US, be kept permanently confidential:

1. Schematics
2. BlockDiagram
3. InternalPhotos
4. Operational Description
5. Tune-Up Procedure

The materials listed above contain technical data, which would customarily be guarded from competitors. In addition, Nuvectora Corporation is requesting that the internal photos within the application be granted confidentiality, because only Nuvectora Corporation employees have access to this information. The Nuvectora Bridge Communicator, which is the subject of Nuvectora Corporation's application for certification, is solely used by Nuvectora sales personnel and will always remain in the physical possession of Nuvectora Corporation's personnel. Information regarding internal photos is not released to the public, the Nuvectora Bridge Communicator cannot be obtained by the public, and any parties with access to this information are required to sign a non-disclosure agreement. 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, but may be eligible for confidentiality in the following circumstances: 'internal photos of a non-consumer device may be held confidential if the device is not accessible to the general public'. We request that the internal photos

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be withheld from public disclosure in accordance with Section 0.457 and 0.459 of the Commission's Rules, 47 CFR. The Nuvectora Bridge Communicator is not available for the general public to order. 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

Nuvectora Corporation 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 Nuvectora Corporation's application for equipment certification with the FCC identifier 2ABU84110. Public disclosure of the short-term confidential portions of this application during the period of importation and/or distribution would reveal key

aspects of the product design to Nuvectora Corporation's competitors and diminish the value of Nuvectora Corporation'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. Nuvectora Corporation requests that the following documents, submitted in connection with its application for certification with FCC identifier 2ABU84110, 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 Setup Photos

Please do not hesitate to contact me at (615) 804-9867 if you would like to discuss this matter.

Sincerely,



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