

1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
tel. 202.434.4100
fax 202.434.4646

Writer's Direct Access

September 12, 2007

Jack Richards
(202) 434-4210
richards@khlaw.com

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

Re: FCC ID: I5Q512; Request for Confidential Treatment

Dear Sir or Madam:

Pursuant to Section 0.459 of the Commission's rules, 47 CFR § 0.459, LifeScan, Inc. ("LifeScan") requests that certain portions of the material contained in the Application for Equipment Authorization for the device bearing the FCC ID: I5Q512 ("Device") associated with this request ("Application") be afforded confidentiality and be withheld from public inspection following the effective date of the grant of the requested authorization.¹

The following addresses the specific factors detailed in Section 0.459 of the Commission's Rules, which governs such requests.

(1) LifeScan seeks confidential treatment of the following materials (collectively the "Material"):

- Block Diagram
- Schematics
- Parts List
- Operational Description

(2) The Material is submitted in connection with the Application;

(3) The Material contains commercial, trade secret, and confidential information that LifeScan does not release to the public and which is otherwise not generally available to the public. Specifically, the Material describes in detail the architecture and operational processes of the Device and includes: a depiction of the Device design (Block Diagram, Schematics), a description of physical elements of the Device (Parts List), and a narrative

¹ Pursuant to Section 0.457(d)(ii) of the Commission's Rules, the Application and all related material is automatically afforded confidential treatment prior to the effective date of the requested authorization. *See* 47 C.F.R. § 0.457(d)(ii).

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describing the Device's operation (Operational Description). This information was developed at LifeScan's expense in the design of a proprietary device incorporating certain features intended to provide a competitive advantage over other devices in the relevant market. Public dissemination of the Materials could facilitate third party reverse engineering of RF and non-RF elements of the Device for competitive purposes;

(4) The Material concerns medical equipment, a blood glucose meter, intended for use by consumers. The market for such equipment is subject to a high degree of competition;

(5) Disclosure of the Material will result in substantial competitive harm to LifeScan as it will permit LifeScan's competitors to access otherwise unavailable information regarding the company's trade secrets and operational details of the Device;

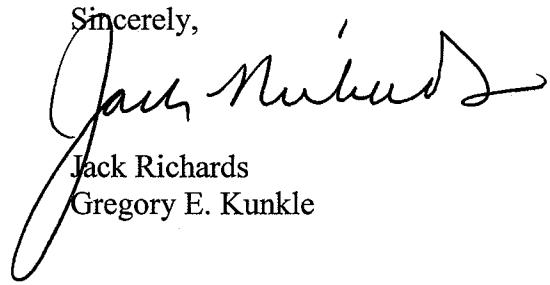
(6) LifeScan has taken steps to preserve the confidential nature of the Material. Included among those steps, LifeScan has not divulged this information to any third parties except as necessary to prepare the Application and with assurances, including through the use of Non-Disclosure Agreements, that the Materials will be kept in confidence;

(7) The information contained in the Material is not available to the public and has not previously been disclosed to third parties except as necessary to prepare the Application;

(8) The Material should be afforded confidential treatment indefinitely as the competitive concerns related to dissemination of the Material will not expire with the passage of time.

To the extent that the Commission has further questions or requires any additional information regarding the necessity for confidentiality in this matter, please feel free to contact the undersigned.

Sincerely,



Jack Richards

Jack Richards
Gregory E. Kunkle