

Medtronic

Medtronic, Inc.

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May 19th, 2020

Equipment Authorization Branch
Federal Communications Commission
Columbia, MD 21046

Subject: Confidentiality Request Letter pertaining to FCC ID No: LF524970A

Ladies and gentlemen,

Medtronic, Inc. ("Medtronic") requests that the information contained in the internal pictures document pertaining to the above referenced application be withheld from public disclosure in accordance with Commission's Rules, 47 C.F.R. § 0.457(d) and 0.459. This request is initiated post issuance of the grant.

The confidential information is embodied in internal photographs of this device designed for patients under the care of a medical professional. As such, this material is treated as highly confidential business information and information that could convey trade secrets pertaining to manufacturing and design techniques. The information for which confidentiality is sought is employed in the design and manufacture of medical device systems that are offered on a highly competitive basis. Customers for this equipment have a variety of competing sources of supply from both domestic and foreign suppliers. Disclosure would, in effect, give away the fruits of the labors of Medtronic's engineering personnel, who have designed the equipment and the manufacturing processes. Disclosure would also offer competitors additional unwarranted insight into the state of product development thereby allowing such competitors an advantage that would not be available to Medtronic.

The information for which confidential treatment is sought is kept confidential by Medtronic and not made available to third parties except pursuant to arrangements designed to prevent public disclosure. The protection sought is narrowly drawn and pertains to certain specific implementations of the technology incorporated into the device for which certification is sought.

Medtronic would like to request Long-Term Confidentiality for the internal pictures document and remove the exhibit from the public domain. Medtronic is aware that the Internal Photos have been available to the public from 10/27/2016 - 05/19/2020.

Following the Equipment Authorization Confidentiality Request Procedures as described in KDB Guidance 726920 D01 of April 8th 2016, Internal Photos may be held Long-Term Confidential under the condition that the circuit board or internal components are not accessible to users.

The Medtronic CareLink SmartSync Device Manager Base Model 24970A (LF524970A) is not available to the public. The device is a Class 3 device regulated by the FDA and is used solely by health care professionals. As some of the screws are hidden and not directly traceable, opening the device is possible, but not likely to occur. Therefore, the equipment to which this Long-Term Confidentiality request pertains satisfies this criterion.

Respectfully,


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