

Subject: Letter of Confidentiality Request

Dear Reviewer,

IMI, requests that the Block Diagram, Schematics, Revision Document, and Operational Description exhibits of the referenced application be withheld from routine availability for public inspection pursuant to Section 0.459 of the Commissions Rules and Freedom of Information Act (FOIA) Exemption 4, 5 U.S.C. 552 (b) (4).

These particular exhibits consist of “trade secrets (or) commercial or financial information obtained from a person and privileged or confidential” 5 U.S.C 552 (b) (4), and is therefore entitled to protection from disclosure under the FOIA. The documents in question contain trade secrets: detailed technical descriptions, specifications, and schematics for a product offered for sale. This proprietary information would give IMI competitors an unearned competitive advantage.

The documents contain “commercial information” within the scope of FOIA exemption 4. This information is the product of IMI investment of money, personnel, and other resources. The result of the investment is a fairly earned position in the marketplace. Premature release of the information threatens substantial and unwarranted harm to IMI’s competitive position.

For these reasons, IMI has taken pains to keep this technical information confidential and intends to continue doing so. IMI customarily withholds rights to this information, granting access only to those who have a particular approved need for the information. AMS grants the Commission their needed access to these documents, but respectfully asks that the information be kept confidential.

The filing fee that is required for this confidentiality request is included in the check that accompanies this application. If there are any questions about this request, please contact me. Thank you.