

February 19, 2007

**Cardiac Rhythm
Management Division**
15900 Valley View Court
Sylmar, CA 91342
818 362-6822
800 777-2237
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Federal Communication Commission
7435 Oakland Mills Rd.
Columbia, MD 21036

Re: Request for confidentiality for FCC ID: RIASJMRFANT

To whom it may concern,

Permanent Confidentiality

Request is hereby submitted by St. Jude Medical to withhold permanently from public review certain portions of the application for equipment certification for the referenced FCC identifier. St. Jude Medical has invested considerable time and materials in research and development to produce the referenced product. Disclosure of the permanently confidential portions of this application to competitors would not only give them significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by us. The internal photos should be granted confidentiality because the device is professionally installed and only personnel authorized by the manufacturer have access to it. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept permanently confidential:

- Schematics
- Detailed Block diagrams
- Detailed Operational/Functional Description
- Tuning procedure
- Internal photos

Short-term Confidentiality

Request is hereby submitted by St. Jude Medical to withhold from public review for a period of 45 days from the date of the Grant of Equipment Authorization and prior to marketing, certain portions of the application for equipment certification for the referenced FCC identifiers. Disclosure of the short-term confidential portions of this application during the period of importation and/or distribution would reveal key aspects of proprietary technology to competitors and diminish the value of our investment in research and development. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept confidential for a period of 45 days from the date of Authorization:

- Test setup photos
- External photos
- User manual

The fee for confidentiality has been submitted along with the fee for certification. If you have questions or need further information, please contact the undersigned.

Sincerely,



Deanna L. Hughes
Regulatory Affairs
St. Jude Medical