CVRx®

To: Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

From: CVRx Inc
9201 West Broadway
Suite 650
Minneapolis MN 55445

Date: November 25, 2013

Subject: CVRx Request for Confidentiality for FCC ID: SVHBAROSTIMIPG1

Dear Sir or Madam:

CVRx respectfully requests specific information to be held from public inspection. Per the FCC Commission Rules Title 47 Part 0, Subpart C Section 0.457 and Section 0.459, CVRx supplies the following to address the reasons for withholding the materials from inspection:

(1) identification of the specific information for which confidential treatment is sought;
Schematic Diagrams Model 2100
Parts List Model 2100
Block Diagram Model 2100
Internal Photographs Model 2100
Operational Description Model 2100

(2) identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:
The application for certification is for FCC ID: SVHBAROSTIMIPG1 implantable medical device.

(3) explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:
The information described above in item **(1)** is used in a sealed implantable medical device and contains information that is considered highly confidential, secret and proprietary. Many years of research and development, and efforts to maintain the confidential nature of these items have preceded this submission.

(4) explanation of the degree to which the information concerns a service that is subject to competition:
The implantable medical device market is highly competitive and is comprised of several companies that are much larger than CVRx.

(5) explanation of how disclosure of the information could result in substantial competitive harm:
This disclosure contains proprietary and trade secret information regarding system architecture, hardware implementation, vendor selection, and the design and manufacturing method. Release of this information would allow competitors unwanted access to years of development effort spent at CVRx.

(6) **identification of any measures taken by the submitting party to prevent unauthorized disclosure**:
The information disclosed is not shown or discussed with the public through any type of publication or presentation. All of these documents are classified as confidential and kept under documentation control to protect access.

(7) identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:
The information disclosed has never been shown to the public, and only shared with third parties through a legally binding non-disclosure agreement. The only limited disclosure to third parties has been specific to address confidential development efforts.

(8) justification of the period during which the submitting party asserts that material should not be available for public disclosure:
CVRx requests the information disclosed not be made public for a term of ten years. The information disclosed is for a new platform architecture, and future product families will be based on this design. The communication architecture demands protection from unauthorized and unwanted viewing to avoid the misuse of the telemetry link.

(9) any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:
This is an implantable medical device which offers therapy to patients needing chronic treatment. Privacy and confidentiality to the inner workings of this device is required to ensure ongoing safety and security.

Regards,

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