NEUROPACE

February 15, 2017

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Request For Confidentiality for FCC ID: WBWRF320

To Whom It May Concern:

NeuroPace, Inc. ("NeuroPace") requests that the information contained in the items enumerated below pertaining to the above-referenced application be withheld from public disclosure in accordance with FCC 47 CRF Section 0.457(d) and 0.459 following grant of the application. In support of this request, NeuroPace request the following be kept permanently confidential for FCC identifier WBWRF320.

Type of Confidentiality Requested		**Exhibit**
☐ Short Term	☒ Permanent	Block Diagrams
☐ Short Term	☒ Permanent	Internal Photos
☐ Short Term	☒ Permanent	Operation Description/Theory of Operation
☐ Short Term	☒ Permanent	Schematics

FCC previously granted permission to keep the block diagram, internal photos, operational description, and schematics long term confidential on the related device (RNS-300M, FCC ID WBWRF300). NeuroPace requests the same permission for the RNS-320 (FCC ID WBWRF320).

The product is a physician prescribed sterile, sealed device designed for implantation in humans. As such, this material is treated as highly confidential business information and information that could convey trade secrets pertaining to manufacturing and design techniques. Internal photos should be held confidential since the device is sealed and implanted in the body and, consequently, disassembly would destroy the product. Please see RNS-320 Device Sealed document for photos and details. Finally, the device is only serviceable by NeuroPace and not by the consumer.

The information for which confidentiality is sought is employed in the design and manufacture of medical devices that are offered on a highly competitive basis. Disclosure would, in effect, give away the fruits of the labors of NeuroPace's engineering personnel, who have designed the equipment and the manufacturing processes. Disclosure would also offer competitors additional unwarranted insight

TOLL-FREE 866.726.3876 | FAX 650.237.2701 | EMAIL customerservice@neuropace.com
455 N Bernardo Avenue, Mountain View, CA 94043 | NeuroPace.com

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into the state of product development thereby allowing such competitors an advantage that would not be available to NeuroPace.

The information for which confidential treatment is sought is kept confidential by NeuroPace and not made available to third parties except pursuant to arrangements designed to prevent public disclosure. To the knowledge of those preparing this application, the information has not been disclosed publicly heretofore.

This material should not be disclosed for at least ten years. While improvements in design are likely to be made during this period, disclosure of the design information would lead to insights into both designs and manufacturing techniques and could have an adverse competitive effect for many years to come. This application contains information that will be used in future applications for similar devices. Moreover, the communications aspects of this device are employed in the programming of a medical implant device and in the transmission of highly private medical information to and from the device. Disclosure of the information for which confidentiality is sought could jeopardize the protection of such personal private medical information generated for the benefit of patients into whom the device has been implanted. As such, it is important that information pertaining to the design and operation of this device not be made available to unauthorized persons who might attempt to use knowledge of the design to compromise the applications for which the equipment will be employed.

Sincerely,

Erica Lundmark, senior design manager
650.237.2700 x126
elundmark@neuropace.com

NeuroPace, Inc.
455 N. Bernardo Ave.
Mountain View, CA 94043