



Nevro Corp. • 1800 Bridge Parkway • Redwood City, CA 94065 USA • 650-251-0005

June 2, 2020

National Technical Systems – Silicon Valley TCB  
41039 Boyce Road  
Fremont, CA 94538

### **Request for Confidentiality**

Dear Examiner:

#### **Permanent Confidentiality:**

Nevro Corp. hereby requests that the Federal Communications Commission (“FCC”) withhold permanently from public review certain portions of Nevro’s application for certification with FCC identifier XKYEXTS3000.

Public disclosure of these portions of the application would not only provide Nevro’s competitors significant competitive advantages in developing similar products but it would disclose successful implementation of unpublished technology developed by us.

This request for confidentiality is made pursuant to 47 CFR 0.457(d)(2) and 0.459 of the FCC rules. Nevro requests that the following documents submitted in connection with the application for certification be kept permanently confidential:

- 1) Operational Description / Theory of Operation
- 2) Block diagrams
- 3) Internal photos
- 4) Schematics

Nevro is requesting that internal photos within the application be granted confidentiality and be withheld from public disclosure in accordance with section 0.457 and 0.459 of the Commission’s Rules, 47 CFR.

Only personnel authorized by Nevro have access to this information. The product is provided to patients after a medical procedure. Information regarding internal photos is not released to the public, the product cannot be obtained by the public and all parties with access to this information are required to sign non-disclosure agreements. As such the internal photos are highly confidential business information and conveys trade secrets pertaining to design and manufacturing.

This device is not available to the general public. It is a prescription medical device provided to physicians through a Nevro representative. All physicians and representatives are under non-disclosure agreements with Nevro. The device is attached to surgically implanted leads and is worn on the patient’s body for a trial period of approximately 8 days. At the end of the trial period, the device is returned to Nevro which is required by US law. This is specified in the User Manual.

We understand that internal photos are not routinely held confidential. This request is similar to other medical implant manufacturers, who have been afforded permanent confidentiality of internal photos.

#### **Short-term Confidentiality:**

Nevro hereby requests that the FCC withhold from public review for a period of 180 days from the date of the Grant of Equipment Authorization, certain portions of the application for equipment certification for FCC identifier XKYEXTS3000, Public disclosure of the short-term



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confidential portions of this application during the period of importations and/or distribution would reveal key aspects of the product design and diminish the value of Nevro's investment in research and development.

This request for confidentiality is made pursuant to 47 CFR 0.457(d)(2) and 0.459 of the FCC rules. Nevro requests that the following documents submitted in connection with the application for certification be kept confidential for a period of 180 days from the date of the Grant of Equipment Authorization:

- 1) User's Manual
- 2) External Photos
- 3) Test Setup Photos

**Summary of request:**

Type of Confidentiality Requested		Exhibit
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Block Diagrams
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	External Photos
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Internal Photo
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Operation Description/Theory of Operation
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Schematics
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	Test Setup Photos
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	User's Manual

Thank you for your attention. Please let the undersigned know if the Commission disagrees with our position or requires further justification.

Sincerely,

DocuSigned by:  
  
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Jon Parker  
 Nevro Corp.  
 Vice President, Product Development