

July 18, 2017

Attention: Application Examiner
Attention: Jim Szeliga, George Tannahill

RE: Request for Confidentiality
Applicant: Exploramed NC7, Inc.
FCC ID: 2AHRJ-07A
Inquiry Reference: 617210

To Whom It May Concern:

This inquiry includes two requests:

- I. Request Long Term Confidentiality for Internal Photos*
- II. Revise RF Exposure Evaluation to Remove Internal Photos*

Request is hereby submitted by Exploramed NC7, Inc. to withhold permanently from public review certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to sections 0.457(d) and 0.459 of the FCC Rules and *726920 D01 Confidentiality Request Procedures v01r02*, Section IV (Special Circumstance) for the following item: internal photos.

The internal photos from the original submission were submitted for Short-Term confidentiality. Exploramed NC7 now requests long term (permanent) confidentiality based on *726920 D01 Confidentiality Request Procedures v01r02*, Section II, Part 3 (internal photos). In this case, the internal photos in Attachment 1 are confidential because they reveal the circuit board and all other internal components of the device which are proprietary.

Additionally, the RF Exposure Evaluation originally submitted contains an image of the internal device. Exploramed NC7 requests the RF Exposure Evaluation to be revised to exclude the image. It may be replaced with the attached, which contains the same evaluation but excludes the image of the internal device. The image of the internal device is not necessary to substantiate the RF Exposure Evaluation. In this case, the internal photos are confidential because they reveal the circuit board and all other internal components of the device which are proprietary.

The reason the internal photos shall be held confidential is that they are not accessible to the public because:

- (1) the device must be disassembled to access the internal components
In order to access the internal components depicted in the internal photos, the outer cover must be removed. There are no screws or other mechanisms visible to indicate how the outer cover may be removed. It requires engineering design

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understanding and specific tools to disengage the cover and reveal the internal components. Therefore, it is not accessible to users. The internal photos show components that are not available to users.

(2) the device is distributed to a limited and controlled customer base

The device is currently distributed after careful screening and execution of a non-disclosure agreement with explicit confidentiality requirements. Furthermore, even after broad distribution, the users are a specific type of customer - a lactating mother who intends to express milk from her breast. The user base does not represent a broad population.

Rationale for request for confidentiality:

Exploramed NC7, Inc. has invested considerable time and materials in research and development to produce the referenced product. Disclosure of the proprietary information specified in this inquiry (internal photos, user manual, RF Exposure Evaluation with internal photos) to competitors not only gives them significant competitive advantages in developing similar products, but also discloses successful implementation of unpublished, leading edge technology developed by us. Disclosure of the confidential portions of this application would reveal key aspects of proprietary technology to competitors and diminish the value of our investment in research and development.

Exploramed NC7, Inc. is aware that the RF Exposure exhibit was publicly available for a period of approximately 10 months from Oct 2016 to Aug 2017 and the Internal Photos were publicly available for a period of approximately 4 months from April 2017 to August 2017.

If you have questions or need further information, please contact the undersigned.

Sincerely,



Keri Ng
Vice President – Clinical, Quality, Regulatory
Exploramed NC7, Inc.
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