



Date: July 10, 2015

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Subject: Non Routine Confidentiality Requirement  
FCC ID No.: 2AB2MPECGT-IIIIV

Ladies and Gentlemen:

We, Medicalgorithmics S.A., understand that the internal photos and user manual of the subjected device are not routinely held confidential, but may be eligible for confidentiality in certain circumstances. Confidentiality for this information may be granted in the following circumstances:

- Internal photos and user manual may be held confidential if it contains information concerning a service that is subjected to competition (§0.459 (b)(4)),
- Internal photos and user manual may be held confidential if disclosure of such information could result in substantial competitive harm (§0.459 (b)(5)),
- Internal photos and user manual of a non-consumer device may be held confidential if the device is not accessible to the general public (§0.459 (b)(7)).

Medicalgorithmics S.A. requests that the User Manual, internal photos and an example of Nondisclosure Agreement pertaining to the above-referenced application be withheld from public disclosure in accordance with Commission's Rules 47 C.F.R. § 0.457(d) and 0.459, following grant of the application.

PocketECG III, type PECGT-IIIIV which is the subject of this filing is not available for general public even on demand. This device is used by general practitioners or cardiologists in ambulatory or hospital environments. Product in certain cases is prescribed to patients directly for limited home use when there is a need for extended monitoring that cannot be done in clinic or hospital environment, always under physician instruction and care. Since the user manual was developed for a narrow circle of professionals (general practitioners or cardiologists), it contains detailed information about device construction and its functionality. Therefore, disclosure of information contained in the user manual could result in substantial competitive harm for our company. Design of the product and its functionality is innovative and unique on the market, which confirms our concerns against the disclosure of such information.

Information regarding the internal photos and user manual is not released to the public, the device cannot be obtained by the public. Moreover any party with access to this information is required to sign a non-disclosure agreement.

It is with this understanding that we respectfully request the agency to honour our request to maintain the internal photos and user manual confidential.

Sincerely,

A handwritten signature in blue ink, appearing to read "Przemysław Tadla".

Przemysław Tadla  
Strategy Director

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