



December 7, 2018

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 XKYWAND1001.

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significant competitive advantages in developing similar products but it would disclose successful implementation of unpublished technology developed by us.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) Tune-up procedure
- 2) Block diagrams
- 3) Internal photos
- 4) Schematics
- 5) Operational Description/ Theory of Operation
- 6) Parts List & Placement/BOM

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.

We understand that internal photos are not routinely held confidential. This request is similar to other medical implant manufactures, 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 XKYWAND1001, Public disclosure of the short-term



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
☐ Short Term	☒ Permanent	Block Diagrams
☒ Short Term	☐ Permanent	External Photos
☐ Short Term	☒ Permanent	Internal Photo
☐ Short Term	☒ Permanent	Operation Description/Theory of Operation
☐ Short Term	☒ Permanent	Parts List & Placement/BOM
☐ Short Term	☒ Permanent	Tune-Up Procedure
☐ Short Term	☒ Permanent	Schematics
☒ Short Term	☐ Permanent	Test Setup Photos
☒ Short Term	☐ 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,

Bob Winn
Nevro Corp.
Senior Manager, Electrical Engineering