



Philips Oral Healthcare
22100 Bothell Everett Hwy
Bothell, WA 98021

December 9, 2019

Attention: Application Examiner

RE: Request for Confidentiality
Applicant: Philips Oral Healthcare, Inc.
FCC ID: 2ADZNHX991
ISED ID: 20109-HX991

To Whom It May Concern:

Permanent Confidentiality

Request is hereby submitted by Philips Oral Healthcare, 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 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept permanently confidential:

- **Schematics**
- **Detailed Block Diagrams**
- **Detailed Operational/Functional Description**
- **Tune up procedure**
- **Parts list**

Short-term Confidentiality

Request is hereby submitted by Philips Oral Healthcare, Inc. to withhold from public review for a period of 45 days from the date of the Grant of Equipment Authorization and prior to marketing, certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept confidential for a period of 45 days from the date of Authorization:

- Test setup photos
- External photos
- Internal photos
- User manual



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Rationale for request for confidentiality:

Philips Oral Healthcare, Inc. has invested considerable time and materials in research and development to produce the referenced product. **Permanent confidentiality:** Disclosure of the permanently confidential portions of this application to competitors would not only give them significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by us. **Short term confidentiality:** Disclosure of the short-term confidential portions of this application during the period of importation and/or distribution would reveal key aspects of proprietary technology to competitors and diminish the value of our investment in research and development.

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

Sincerely,

Matthew Vasa
Engineer, Safety and Approbations,
Philips Oral Healthcare