

Document Control Desk, Director
Office of Federal and State Materials and Environmental Management Programs
Attention: GLTS
U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001

May 28, 2013

Dear Director,

I am the Executive Vice President for Mahlo America, Inc and have been delegated the responsibility of reviewing the described reports herein, which is sought to be withheld, and have been authorized to apply for its withholding. I am familiar with competitive practices in the market for on-line web gauging systems etc., containing nuclear sealed sources licensed by the Nuclear Regulatory Commission.

Mahlo America, Inc. is required by Title 10 CFR 32.52 to submit reports of the distribution of Generally Licensed devices to the Nuclear Regulatory Commission and individual Agreement States every calendar quarter, listing the names and addresses of each client to whom authorized devices are transferred to and licensees from whom we receive them. Additional information about the device, such as isotope, quantity and model number is also required.

Mahlo America, Inc. is the sole owner of the information provided in the reports described above. To the best of my knowledge, the information, as presented, is not currently available in public sources. Mahlo America, Inc. customarily treats this type of information as confidential. The company has an unwritten information classification and release policy and practice, and under this policy, lists of active customers and information relevant to commercial transactions is considered proprietary.

Examples of information considered by Mahlo America, Inc. as proprietary information are customer lists and amounts of shipments. Such information, if made available and is used by our competitors, would provide direct tunnels, inroads/intrusion into our marketplaces. This would provide our competitors a head start and marked economic advantage and thus adversely impact well-being of our business.

Additionally, a significant part of Mahlo America, Inc. is supported by continuing services. A number of independent entities in USA and abroad could use the information in these device transfer reports including the customer list to enter our market space.

JSMEIO

Page 2 -

The information we are requesting to be withheld from public is all data printed in transfer report pages with the headings of "Transfers of devices to and from General Licensees."

In view of the above, Mahlo America, Inc. respectfully requests that the quarterly distribution reports of Generally Licensed devices be withheld from public disclosure.

Signed: Alan Lavore

Title: Executive Vice President

Date: May 28, 2013



Acknowledgement:

The forgoing affidavit was acknowledged as true and correct before me this day,
May 28, 2013.

Mary B. Heath
Exp. June 13, 2021