

## Bhachu, Ujagar

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**From:** Ramon Perez <ramon@ndc.com>  
**Sent:** Thursday, August 15, 2013 7:09 PM  
**To:** Bhachu, Ujagar  
**Subject:** RE: Quarterlies Report - NDC Infrared Engineering  
**Attachments:** NDC Affidavit for Quarterlies.pdf  
  
**Categories:** Orange Category

Hello Mr. Bhachu,

Attached is the notarized affidavit. The original documents were sent today via FedEx standard overnight, tracking number 5146 6130 2503.

Best Regards,  
Ramon

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**From:** Ramon Perez  
**Sent:** Thursday, August 15, 2013 11:26 AM  
**To:** 'Bhachu, Ujagar'  
**Subject:** RE: Quarterlies Report - NDC Infrared Engineering

Hello Mr. Bhachu,

The form will be notarized today and will most likely be mailed tomorrow.

I will try to send you a copy via e-mail today.

Best Regards,  
Ramon

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**From:** Bhachu, Ujagar [<mailto:Ujagar.Bhachu@nrc.gov>]  
**Sent:** Thursday, August 15, 2013 7:37 AM  
**To:** Ramon Perez  
**Subject:** RE: Quarterlies Report - NDC Infrared Engineering

Did you submit an affidavit?

Ujagar

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**From:** Ramon Perez [<mailto:ramon@ndc.com>]  
**Sent:** Friday, August 09, 2013 4:47 PM  
**To:** Bhachu, Ujagar  
**Subject:** Quarterlies Report - NDC Infrared Engineering

Hello Mr. Bhachu,

Here is my email address. Please let us know what NDC needs to do to keep our Quarterlies Report private. Thank you for your help.

Best Regards,

Ramon Perez  
NDC Infrared Engineering Inc.  
Tel: (626) 960-3300 x3894  
Direct Line: (626) 939-3894  
email: [ramon@ndc.com](mailto:ramon@ndc.com)



August 15, 2013

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

To whom it may concern:

I am the Radiation Safety Officer for NDC Infrared Engineering 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 *products etc.*, containing nuclear sealed sources licensed by the Nuclear Regulatory Commission.

NDC Infrared Engineering 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.

NDC Infrared Engineering 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. NDC Infrared Engineering 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 NDC Infrared Engineering 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 NDC Infrared Engineering 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.

NDC Infrared Engineering Inc., 5314 North Irwindale Avenue, Irwindale, CA 91706 USA  
Telephone: (626) 960 - 3300, Fax: (626) 939-3870, info@ndcinfrared.com



[www.ndcinfrared.com](http://www.ndcinfrared.com)



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

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

Sincerely,

Frank Aguirre  
Radiation Safety Officer  
NDC Infrared Engineering Inc

### ACKNOWLEDGMENT

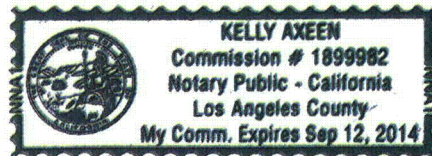
State of California  
County of Los Angeles

On 15-August 2013 before me, Kelly Axeen, Notary Public personally appeared Frank Aguirre, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature



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