

Industrial Dynamics Company, Ltd.
World Headquarters: 3100 Fujita Street, Torrance, CA 90505-4007 U.S.A.
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Office: 310-325-5633 Fax: 310-530-1000

May 28, 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 Industrial Dynamics Company, Ltd. (IDC), 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.

IDC 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 provided.

IDC 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. IDC customarily treats this type of information as confidential. The company considers lists of active customers and information relevant to commercial transactions to be proprietary.

Examples of information considered by IDC as proprietary information are customer lists and shipments details. 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 the well-being of our business.

Additionally, a significant part of IDC 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.

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, IDC respectfully requests that the quarterly distribution reports of Generally Licensed devices be withheld from public disclosure.

Yours Truly,

Terry Williams

Radiation Safety Officer

Industrial Dynamics Company, Ltd.

Date: 05/30/13

COMM. #1909527
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My Comm. Expires OCT. 21, 2014

YOOJIN C. KIM

INSPECT. DETECT. PROTECT.

State of: California		166 H.M.
County of: Los Angeles		
On5/30/13	Yodyin C. Kim Notary (name and title of the officer)	public
personally appeared William 5	Terrence Anthony	

who proved to me on the basis of satisfactory evidence to be the person (s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity (ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) 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

ACKNOWLEDGMENT

Signature of Notary Public

YOOJIN C. KIM
COMM. #1909527
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My Comm. Expires OCT. 21, 2014

(seal)