

Not in Adams.

ADVANCED GAUGING
TECHNOLOGIES, L.L.C. 
● QUALITY INDUSTRIAL INSTRUMENTATION

April 19, 2013

Director, Office of F.S.M.E.M.P.
Attention: GLTS
United States Nuclear Regulatory Commission
Washington D.C. 20555-0001

SUBJECT: Confidential information submitted under 10 CFR 2.390

In accordance with the requirements of 10 CFR 2.390, Advanced Gauging Technologies, L.L.C. (A.G.T.) herewith submits an affidavit in support of withholding proprietary information.

If you have any questions, please contact me at (614) 873-6691 or at ScottC@AdvGauging.com.

Sincerely,

Scott A Cook

Scott A. Cook, Owner
Advanced Gauging Technologies, L.L.C.

Enclosure: (1) Affidavit for withholding proprietary information.
(2) Quarterly Transfer List

CC: DPHR, IEMA, ODH, TDH

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Advanced Gauging Technologies, L.L.C.
10 C.F.R. 2.390 AFFIDAVIT OF SCOTT A. COOK, OWNER

AFFIDAVIT

I, **Scott A. Cook**, hereby affirm that I am the Owner of Advanced Gauging Technologies, L.L.C. (A.G.T.). I am authorized to execute this affidavit on behalf of A.G.T. and have reviewed the information which is identified as *proprietary and referenced in the paragraph immediately below*. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is contained in Enclosure 2 as listed below:

1. Quarterly Transfer List (Proprietary Version)

This list has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Advanced Gauging Technologies, L.L.C. in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (a)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information requested to be withheld may reveal to competitors A.G.T.'s cost and price information, production capabilities, budget levels, trade secrets, commercial and developmental strategies and long-term objectives, competitive advantages, information regarding operations and the development of prospective projects, intellectual property, innovation areas, and key performance indicators.

- 2) Public disclosure of the information is likely to cause substantial harm to the competitive position of A.G.T. because:
- a. Competitors of A.G.T. manufacture and sell similar products.
 - b. Research and development of this information executed by A.G.T. required extensive expenditure of time and resources. A competitor would also have to incur similar expense in duplicating equivalent information.
 - c. The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.
 - d. Significant research, development, engineering, analytical, licensing, quality assurance and other costs and expenses played a factor in the pricing of A.G.T.'s products and services. The ability of the competitors to utilize such information without similar expenditure of resources may enable them to sell and provide services at prices reflecting significantly lower costs. Disclosure of the Quarterly Transfer List would have a negative impact on A.G.T. because of a loss of competitive advantage due to the costs associated with the development of A.G.T.'s product and services. Providing public access to such information could permit competitors to duplicate the documents without incurring the associated costs.
 - e. Extensive research and marketing costs went into acquiring the customer(s) listed in the enclosed document. A competitor would also have to incur similar time and expense in acquiring said customer(s).

Scott A. Cook

Scott A. Cook, Owner

4/19/2013

Date