

AFFIDAVIT PURSUANT TO 10 CFR 2.390

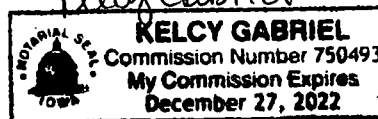
I, Jacob Clos, Quality Manager of Fisher Controls International, LLC ("Fisher"), being duly sworn, depose and state as follows:

1. I have been specifically delegated the function of reviewing the information sought to be withheld and am authorized to apply for its withholding for Fisher.
2. Fisher is providing the NRC with the names of Fisher customers and sales representatives as well as information relating to the internal testing methodologies as part of Fisher's Reply to NRC Inspection Report NO. 99900105/2019-201, Notices of Nonconformance. This information is Fisher Proprietary Information and is indicated in the reply by redaction.
3. In making this application for withholding of proprietary information of which it is the owner, Fisher relies upon the exemption from disclosure set forth in the paragraph (a)(4) of 10 CFR 2.390 as all material for which exemption from disclosure is here sought is "trade secrets and commercial or financial information obtained from a person and privileged or confidential."
4. The information sought to be withheld is being submitted to the NRC in confidence. The information is of a sort customarily held in confidence by Fisher and is in fact so held. The information sought has, to the best of my knowledge, and belief, consistently been held in confidence by Fisher. No public disclosure has been made, and it is not available in public sources. All disclosures to third parties, including any required transmittals to the NRC have been made, or must be made pursuant to regulatory provisions or proprietary agreements which provide maintenance of the information in confidence.
5. Public disclosure of this information is likely to cause substantial harm to the competitive position of Fisher for the reasons outlined below:
 - a. The information names the customers of Fisher and competitors of Fisher would be able to use such information, without undertaking any work or incurring any cost, to target and displace Fisher products which could result in financial injury to Fisher.
 - b. The information provides testing data of Fisher and competitors of Fisher could use such information to normalize their own testing processes and procedures or claim an equivalent understanding of the subject matter by demonstrating that they can arrive at the same or similar conclusion, either of which would result in a loss of Fisher's competitive advantage.
6. Accordingly, Fisher requests that the designated information be withheld from public disclosure pursuant to paragraph (a)(4) of 10 CFR 2.390



Jacob Clos
Fisher Controls International, LLC

Subscribed and sworn to me this 10th date of Feb, 2020. (Notary Public)



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NRR