

PUBLIC

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of RAMBUS INC., a corporation)))))))	Docket No. 9302
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DECLARATION OF ROBERT DONNELLY

I, Robert Donnelly, based upon my personal knowledge concerning matters to which I am competent to testify, hereby declare as follows:

1. I am Vice President of the Computing and Consumer Group at Micron Technology Inc. ("Micron").
2. Micron is not a party to the captioned matter.
3. I am generally familiar with the types of documents for which Micron is seeking in camera treatment as well as the type of information contained in those documents. I am also generally familiar with the confidentiality protection afforded this type of information by Micron.
4. As explained further below, it is my belief that disclosure of the documents and information described in Non-Party Micron's Motion for In Camera Treatment would cause Micron serious competitive injury.

5. I understand that certain of the documents listed as potential exhibits contain confidential minutes and other documents relating to the proceedings and technical discussions of the ADT or "Advanced DRAM Technology" group.

6. ADT is a research collaboration, of which Micron is one of several members, that was formed to develop advanced DRAM technology. I understand that ADT members are bound to maintain the confidentiality of ADT's information and that its members disseminate such information on a need to know basis. To the best of my knowledge, Micron has abided, and continues to abide, by these confidentiality requirements.

7. Disclosure of these documents threatens to cause Micron serious competitive injury. ADT could potentially lose trade secret protection for its technology, and competitors might gain the ability to copy or exploit the ADT technology.

B. JEDEC Technical Document

8. I understand that one of the documents listed as a potential trial exhibit reflects confidential information generated by participants in JEDEC. This information includes a recent technical discussion of DDR 2 DRAM technology involving JEDEC participants.

9. Discussions such as this, which relate to the development of future memory products, are confidential and as such are closely guarded. Participants are not permitted to disclose such technical discussions publicly.

10. If publicly disclosed, such information could be used to Micron's competitive detriment by non-JEDEC competitors in the design and marketing of their own products.

C. Micron Pricing and Planning

11. It is my understanding that a number of the documents listed as potential exhibits include sensitive information regarding Micron's prices, pricing plans and strategies, production, and product allocation. It is my belief that disclosure of such information threatens to compromise Micron's competitive position in one or more of these areas.

12. With respect to pricing, this is not an industry where products are simply sold at a "list" price. Rather, discounts and other special pricing arrangements are commonly used to win business. Thus, disclosure of Micron's customer pricing and pricing forecasts would give competitors a roadmap as to how to successfully compete against Micron. In addition, competitors would be able to incite certain Micron customers by suggesting that they had been treated less favorably than other Micron customers.

13. With respect to documents regarding production figures and product allocation, disclosure of such documents could severely disadvantage Micron as compared with its competitors. Micron competes not only on the quality and performance of its products, but also on its ability to provide products in quantities and on schedules that meet customer demands. Competitors could use this information to persuade customers that Micron is unable or unwilling to meet their requirements, or treats them less favorably than other customers.

14. The type of information described above in Paragraphs 11-12 is considered highly confidential and proprietary within Micron. The information is typically disseminated on a need to know basis.

D. Licensing Documents

15. I understand that several of the documents listed as potential trial exhibits are either confidential draft Micron license agreements or documents relating to such agreements.

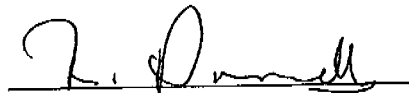
16. It is my belief that disclosure of these documents threatens to cause Micron serious competitive injury. Other parties from with whom Micron desires to negotiate a technology license could use the terms of these licenses to their advantage in negotiating the terms of their arrangement with Micron.

E. Confidential Customer Communications

17. I understand that certain documents listed as potential trial exhibits contain confidential information conveyed to Micron by its customers. Customers often share information with Micron regarding their current demand, demand forecasts, and production plans. Much of this information is highly confidential and is shared with Micron only because the customer recognizes the need to work in partnership with its suppliers. Micron, in turn, is expected to preserve the confidential nature of this information, as well as the confidentiality of the prices it offers to a particular customer.

18. Disclosure of this customer information threatens to seriously undermine Micron's current customer relationships. In addition, prospective Micron customers would be in doubt as to whether the confidential information they share with Micron would find its way into the marketplace. In this event, Micron would find its competitive position significantly weakened.

I declare under penalty of perjury under the Laws of the United States of America
that the foregoing is true and correct. Executed this 29th day of July, 2003 in Boise,
Idaho.

A handwritten signature in cursive script, appearing to read "R. Donnelly", is written over a horizontal line.

Robert Donnelly

Micron Technology Inc.
Boise, Idaho