

Benway Electronics Co., Ltd

5/22/14

Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Request for Confidentiality

Company name: Benway Electronics Co., Ltd
FCC ID: 2AA28BB
FCC Part 15 Certification

Gentlemen,

Pursuant to 47 CFR 0.457(d)(1)(ii) and 0.459 **ACCO Brands, Inc.** hereby requests permanent confidentiality of the following documents for the subject application:

| Exhibit Type | File Name | Description |
|-------------------------|-----------------------------|------------------------------------------------------------|
| Block Diagram | Block Diagram.pdf | Details of device showing the frequency of all oscillators |
| Operational Description | Operational Description.pdf | Description of the circuit functions |
| Schematics | Schemetic diagram.pdf | All circuitry of devices and component values |
| Parts / BOM | | |
| Tune-Up Procedure | | |

Note: Any exhibit NOT granted Confidential status is viewable on the FCC website as soon as the Grant is issued.

Reason why the material should be withheld from public inspection:

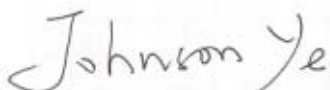
These documents contain detailed system, equipment description and related information about the product which **Benway Electronics Co., Ltd** considers proprietary, confidential, and a custom design not otherwise available to the general public.

State why the information is a "trade secret;"

Since the design is a basis from which future products will evolve, **ACCO Brands, Inc.** considers that this information would be of significant benefit to its competitors and that disclosure would give competitors an unfair advantage in the marketplace.

Trade secret" information is information which is not generally known or reasonably ascertainable, by which a business can obtain an economic advantage over competitors. The information is not normally released to any party or person outside the company.

Sincerely,



Signature:

| | |
|----------|-----------------------------|
| Name: | Johnson Ye |
| Company: | Benway Electronics Co., Ltd |
| Title: | Manager |
| Date: | May 22, 2014 |