



30 June 2020

Federal Communications Commission  
Equipment Authorisation Branch  
7435 Oakland Mills Road  
Columbia, MD21046  
United States of America

Subject: Third Party Confidentiality Request for Exhibits under FCC ID: **2AC20-SCR200MO**

To Whom It May Concern:

Pursuant of Section 0.457 and 0.459 of the Commission's Rules and KDB 726920 D01 Confidentiality Request Procedures, we hereby request that the exhibits listed below, submitted in support of the certification application for FCC ID: 2AC20-SCR200MO, be withheld permanently from public disclosure:

- Schematics
- Block Diagram
- Operational Description
- Internal Photographs

The above exhibits, owned solely by Windcave Limited, contain trade secrets and proprietary information which is not routinely available to the public or to our competitors. The public disclosure of these materials may be harmful to the applicant and provide unjustified benefits to its competitors.

Confidentiality of the internal photographs is specifically sought because the device could be re-engineered from the photographs.

Windcave controls information about and access to the device as follows:



Windcave Limited  
33 Wilkinson Road, Ellerslie  
Auckland 1060  
New Zealand

- The schematics, internal photographs and the like are only used internally by Windcave or by those 3<sup>rd</sup> parties as are required to complete product testing.
- User manuals do not include schematics, internal photographs, detailed descriptions of device operation or detailed block diagrams.
- To meet strict Payment Card Industry ([www.pcisecuritystandards.org](http://www.pcisecuritystandards.org)) security requirements, the devices include security mechanisms which disable the device if it is opened and prevent the modification of the firmware by the user.
- The PCI Security Standards require that all devices are returned to Windcave Ltd. at their end of life. Therefore Section 7.6 of the Windcave Customer Contract states:  
*"Consequences of termination: On the termination of this Agreement, you must immediately:*

a) *return all Windcave Limited Products to Windcave Limited..."*

The applicant understands that pursuant to Section 0.457 of the Rules, disclosure of this application and all accompanying documentation will not be made before the date of the Grant for this application.

Yours sincerely

A handwritten signature in blue ink that appears to read "Collard".

Cameron Collard

Global Head of Compliance, Risk and PMO

Windcave Limited