



Date: 27th Feb 2018

Federal Communications Commission
Office of Engineering and Technology Laboratory Division
7435 Oakland Mills Rd
Columbia MD 21046-1609

Subject: Request for long-term confidentiality of documents pertaining to FCC ID: 2AGHF-RCOMBCM001 currently public on the FCC website

To Whom It May Concern:

The Rainbow Communications System (RCOM) is a point to multipoint short range, radio communications system that operates in the frequency band 5470MHz to 5725MHz. The wireless part is comprised of two units, the Base Station (2AGHF-RCOMBS001) and the Bot Communication Module (2AGHF-RCOMBCM001), which form the two radio parts of the point to multipoint system. One Base Station can be connected to many Bot Control Modules at any time. The purpose of the radio system is to provide a low data rate, bi-directional, wireless connection to a large number of low speed factory machines which transport goods, in a controlled manner, around the facility.

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's rules, we are requesting the Commission to remove the following that is currently published on the FCC website since 4th Aug 2016 for 2AGHF-RCOMBCM001. Ocado are aware that the information has been visible on the World Wide Web, since the grant was issued 4th Aug 2016. These are confidential documents and not for public disclosure. These documents are commercially sensitive and were they to remain on your site, would give our competitors information that could not otherwise be obtained. We are requesting the same retroactively as we came across the documents on the FCC website on 23rd June 2017.

We request the following list of documents to be held long-term confidential, thereby removed from the Commission's website, which corresponds to the FCC ID 2AGHF-RCOMBCM001.

Attachment name	Exhibit Type
User guide	User Manual
Internal photos 8	Internal Photos
Internal photos 9	Internal Photos
Method to achieve FHSS	Cover Letter(s)

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RCOM operates and is installed in restricted places, where public access is not possible. Also, 2AGHF-RCOMBCM001 is installed within the factory robot, accessible only to designated engineers within the warehouse. The individual modules within 2AGHF-RCOMBCM001 should therefore not be revealed to the public. No third parties will be able to perform software updates to 2AGHF-RCOMBCM001. This means professionals from Ocado will install the kit and that any maintenance work or software updates are carried out by a maintenance/installation engineer from Ocado.

We request long-term confidentiality of the User Manual, as it is in fact a "technical" manual consisting of detailed system operational and equipment description used by only qualified technician requiring non-disclosure agreement for the access. Also, access to the "technical" manual may be given to our prospective customers along with sales literature and non-disclosure agreement. We also request long-term confidentiality of Internal photos, as these units are sealed non-consumer devices, serviceable by only designated technicians requiring non-disclosure agreement for access. We also request long-term confidentiality for attachment named "Method to achieve FHSS" submitted as a Cover Letter, as it includes technical description of frequency hopping sequence, which is also part of our proprietary technology.

We request to keep the above list of documents long-term confidential, in addition to our prior request dated 2nd Dec 2015, which included Block Diagram, Bill of Materials, Schematics and Operational Description.

The above listed documents contain confidential information, which Ocado deems to be proprietary, custom design, which would not be released to the general public. Since this design is a basis from which future technological products will evolve, Ocado considers that this information would be of benefit to its competitors, and that disclosure of the information in these documents would give competitors an unfair advantage in the market. These solutions or information thereof are not accessible even for our customers or partners unless non-disclosure agreements for particular item(s) have been signed.

If additional information is needed, please contact us on the below listed address.

Best Regards,

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