

June 2, 2021

Via Electronic Mail and Overnight Courier

To: FCC OET
45 L Street NE
Washington DC 20554

Re: Request for Long-Term Confidential Treatment by the FCC of an Internal Photo Exhibit

Verily requests that the Commission indefinitely withhold from public disclosure the internal photo exhibit for FCC ID: 2AJ3K-990-04082-00 as a confidential document. As section II in the Equipment Authorization Confidentiality Request Procedures (FCC OET Publication No 726920) describes:

- 3) The internal photos and/or user's manual exhibits may be given Long-Term Confidentiality under the following **special conditions**⁴:
 - a) Internal photos
 1. May be held confidential if the circuit board or internal components are not accessible to users. For example, it is acceptable if the circuit board is enclosed in epoxy.

The device with FCC ID 2AJ3K-990-04082-00 is rated to IP56 and IP57 for ingress protection. The housing is completely sealed and welded shut, and is not serviceable by either the user or by Verily.

The damage introduced by a user opening a device is similar to the damage that could be caused by extracting a circuit board covered in epoxy. Specialized fixturing and tools must be utilized to extract a circuit board from a housing for failure analysis when doing so is necessary in Verily's laboratories. The fixture consists of custom-machined parts fabricated by Verily and not accessible to the user.

Protection of the internal photo exhibit from routine disclosure also is warranted because the market for this technology is highly competitive, with numerous companies seeking the business of potential customers. Were Verily's competitors to become aware of technical details from the internal photo exhibit, it could have an adverse impact on our competitive standing and deprive us of the marketplace benefit we otherwise might achieve by virtue of having the product available before other competitors. Furthermore, the information contained in the internal photo exhibit has been strictly controlled by us, with distribution limited to internal use only and for the specific purpose of conducting research, development, and user testing of the technology.

For the above reasons, the internal photo exhibit for the device with FCC ID 2AJ3K-990-04082-00 reflects the special conditions described in FCC OET Publication No 726920. Verily hereby requests that the FCC withhold this exhibit from routine public disclosure indefinitely.

Sincerely,

Verily Life Sciences LLC

By: 

Name: Richard M. Stewart, Ph.D.

Title: Head of Regulatory Affairs