



Federal Communications Commission
Authorization and Evaluation Division

Confidentiality Request regarding application for certification of FCC ID: 2AJRC-1601.

Pursuant to Sections 0.457 and 0.459 of the Commission's Rules, we hereby request confidential treatment (long-term confidentiality) of information accompanying this application as outlined below:

Exhibit Type

Block Diagram

Schematics

Operational Description

Internal Photos

File Name

CONF_BLKDIA

CONF_SCHEM

CONF_OPDES

CONF_INTPH

The above materials contain trade secrets and proprietary information not customarily released to the public. The public disclosure of these materials may be harmful to the applicant and provide unjustified benefits to its competitors.

Additionally, with regards to the internal photos, the device is not publicly accessible, with the exception of the front user interface. The device can't perform as a standalone product, but is designed to be integrated into a larger system, which would have restricted access. Once installed, the product enclosures cannot be removed. The installation of devices in such systems is protected under an NDA, which also restricts the second party from disclosing confidential information to any third party. The device is never serviced in the field, but always returned to Quest where servicing is performed by in-house technicians in a designated area. Internal photos are handled in the same manner as other proprietary design information, such as schematics, by storing them on the Quest network in an area restricted to staff working directly on the product designs.

Also, when PCI (Payment Card Industry standards body) determines the security of a device, they calculate the attack potential of the device. Part of this calculation is called 'Knowledge of Point-Of-Interaction device', and the security requirements describe how to determine the expertise level required to attack the device and discuss 'Public Information' as follows:
Information is considered public if it can be easily obtained by anyone (for example, online) or if it is provided by the vendor to any customer. We believe that presenting the internal photos as public information would weaken the security of the device, as assessed by PCI. Accordingly, we request long-term confidentiality for the 'internal photos' exhibit, along with the other exhibits mentioned above.

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.

Sincerely,

Zivko Jovanovski

Hardware Engineering Manager

Rev 11/20/07