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Confidentiality Request

Date: 21st August 2018

Federal Communications Commission
Authorization and Evaluation Division

Dear Sir/Madam:

The above-referenced application, filed by Utsi Electronics Ltd, seeks certification for a Ground Penetrating Radar (GPR) device. The application shows compliance with the Commission's Rules and does not require a waiver.

We request that the photographs showing the interior of the device be withheld from the public disclosure. The Commission has previously granted confidentiality under similar conditions to the following applications:

FCC ID QF7MINISIR
FCC ID QF750400 EA640311
FCC ID QF762000 EA291754
FCC ID QF75103A EA870041
FCC ID QLA250MHZ EA586775
FCC ID QIAMID EA364767
FCC ID QLA500MHZ EA369105
FCC ID QLA800MHZ EA813498

FACTUAL BASIS FOR REQUEST

Ordinarily the Commission denies confidentiality to photographs of a device on the grounds that information they contain is freely available to a competitor, simply by purchasing the device and (if necessary) unscrewing the cover.

The device in question is different. The interior is sealed and its internal appearance is inaccessible to the purchaser.

To gain access to the views shown in the interior photographs, a competitor would have to purchase the device and then remove the security screws that are unique. Without the proper tool the screws would have to be drilled out causing severe damage to the antenna, reflective housing and electronic parts.

The circuit boards are covered with a conformal coating to prevent reverse engineering. Removal of this by any process will cause severe damage to the components and circuit board traces.

The circuit boards are secured mechanically by means of bolts rivets and finally by epoxy/RTV.

Removal by any means of the epoxy/RTV will cause damage to the circuit board traces and possibly the components.

Utsi Electronics Ltd has never released instructions on how to disassemble its units and does not answer questions on how to do so. This information is kept internal to the company. Our company's repair process involves entire circuit board replacement, because the boards once coated are not repairable to the component level. If the unit is sent in for repair and shows any evidence of tampering, our policy would be not to repair it, and charge the customer for a new unit.

The Commission's posting of the photographs would allow a competitor to:

1. Identify critical components of the design and their placement in the circuit.
2. Estimate the cost of manufacturing the printed circuit boards and mechanical components.
3. Estimate compatibility problems the manufacturer will have in designing new systems.
4. Determine the age of the electronic design, which gives valuable competitive information on upgrade and R&D efforts.

Access to interior photographs of our unit would give the competitor enough information to generate a schematic by reverse engineering.

We respectfully submit that manufacturers should not be required to give a competitor the benefit of thousands of hours of engineering expense.

Sincerely,

A handwritten signature in black ink, appearing to read "Vincent Utsi". The signature is fluid and cursive, with the first name "Vincent" written in a larger, more prominent script than the last name "Utsi".

Vincent Utsi
Director