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October 30<sup>th</sup>, 2020

**To:**

Federal Communications Commission  
Authorization and Evaluation Division  
7435 Oakland Mills Road  
Columbia, MD 21046

Subject: **Long Term/Permanent Confidentiality Request** for FCC ID: **2AUVU-P28DUGA1**

To Whom It May Concern,

Pursuant to CFR 47 §0.457 and §0.459, we respectfully request permanent confidential treatment of the following exhibits accompanying this application (see KDB 726920):

- **Block Diagram**
- **Schematics**
- **Operational Description**
- **Parts List**
- **Internal Photographs**
- **User Manual/Quick Start Guide**

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, Pivot is a network infrastructure ISB system, only to be sold to carriers under NDA (see attached customer NDA example). The system is mounted on a pole or tower 30 or more feet up, not accessible to the public. Installation and maintenance of the system is only allowed by trained professionals. Pivot is not a consumer device.

We, the applicant, understand that disclosure of this application and all accompanying documentation will not be made before the date of the Grant for this application.

Sincerely,  
DocuSigned by:

*Chris Brandon*

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Chris Brandon  
Chief Operating Officer  
Pivotal Commware