

## **CONFIDENTIALITY REQUEST**

Federal Communication Commission Equipment Authorization Division, Application Processing Branch 7435 Oakland Mills Road Columbia, MD 21048

June 21, 2021

## TO WHOM IT MAY CONCERN

Pursuant to Paragraphs §0.457(d) and 0.459 of the Commission's Rules (47 C.F.R.) and Section §552(b)(4) of the Freedom of Information Act, Company requests confidentiality for the following products:

FCC ID Number Product: **2AY33-ADEC430531**Title/Model A-dec Gateway/43.0531.00

For the product stated above, we request that the following information be held confidential:

- 1. Circuit diagrams, BOM, and PCBs submitted as Equipment Authorization Electronic Filing attachment: "Schematics".
- 2. Block diagram submitted as Equipment Authorization Electronic Filing attachment: "blockdiagram".
- 3. Operational description submitted as Equipment Authorization Electronic Filing attachment: "operational description"

The above exhibits contain Company trade secrets and proprietary information that could be of benefit to our competitors regarding the design of our mobile handset. This material is not customarily available to the general public and we request that it be withheld from public inspection.

## **Short Term Confidentiality**

In addition to the above mentioned documents, pursuant to Public Notice DA 04-1705 of the Commission's policy, in order to comply with the marketing regulations in 47 CFR §2.803 and the importation rules in 47 CFR §2.1204, while ensuring that business sensitive information remains confidential until the actual marketing of newly authorized devices, A-dec, Inc. requests that the Commission withholds the following documents from public viewing for one hundred and eighty days after the date the grant of equipment authorization is issued:

•External Photographs •Internal Photographs •Test Setup Photographs •User Manual

These documents reveal technical and design information that has not been publicly disclosed in marketing materials and is protected by A-dec, Inc. as confidential and proprietary trade secrets. This information has been disclosed to those required to maintain its confidentiality and is not customarily disclosed publicly prior to the commercial release of the device.

As a result, disclosure of this information by the Commission prior to commercial release would harm A-dec, Inc. by giving competitors an unfair market advantage. A-dec, Inc. believes the period of confidentiality requested is necessary to protect the information until the commercial release of a device. It is our understanding that measurement test reports and FCC ID label format cannot be granted as confidential documents and this information will be available for public review once the grant of equipment authorization is issued.

If you have any questions, please feel free to contact me at the address shown below. Sincerely,

Raquel Peregrino de Brito

Senior Regulatory Engineer

2601 Crestview Dr Newberg, OR 97132 regulatory@a-dec.com <u>a-dec.com</u>