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Confidentiality Letter Internal Photos

Date: 12/15/2023

FCC ID: 2BBDZ166-53-05NA-E

IC ID: 31259-166-53-05NA-E

To Whom It May Concern:

The above-referenced application, filed by GPR, Inc., seeks certification for a ground-penetrating radar (GPR) device. The application shows compliance with the Bureau's Rules and waiver orders DA 23-1041 and DA 23-1109.

We request that certain photographs showing the interior of the devices be withheld from public disclosure.

FACTUAL BASIS FOR CONFIDENTIALITY REQUEST

Ordinarily the Bureau denies confidentiality to photographs of a device on the grounds that the 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 carry out the following steps:

1. Remove all the tamper proof screws securing the cover to the rest of the enclosure.
2. With the custom antenna enclosure open the various electronic assemblies must be disassembled in a careful and properly ordered manner using enhanced ESD precautions to prevent irreversible damage to the components.
3. RF absorbers are incorporated into the enclosures of the transmitter elements. These absorbers possess distinct electrical properties and function optimally only when arranged according to the specific design. It is improbable that a competitor would possess access to the correct material or be aware of the appropriate material grade and orientations needed for effective installation.

GPR, Inc. 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. If a unit arrives at the company's repair facility showing evidence of such tampering, the company does not repair it, but charges the customer for a new unit plus freight costs.



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The Bureau's publication of the images enables a competitor to circumvent the challenging and costly disassembly process. Through these photographs, a competitor can assess:

1. The expenses associated with manufacturing the printed circuit boards and mechanical housing.
2. The labor hours needed for assembling the device.
3. Potential compatibility issues the manufacturer may encounter when developing new systems.
4. The age of the electronic design, providing valuable competitive insights into upgrade and research and development (R&D) efforts.

Allowing competitors access to interior photographs would essentially enable them to reverse engineer the product completely, even to the extent of generating a schematic. We respectfully argue against the notion that manufacturers should be obligated to provide competitors with the results of extensive and costly engineering efforts.

Regards,

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