



December 19, 2024

HCT America
1726 Ringwood Avenue
San Jose, CA 95131

Subject: Confidentiality Request for FCC ID 2BML6P2EV1-0

To Whom It May Concern,

Pursuant to section 552(b)(4) of the Freedom of Information Act and sections 0.457(d)(1)(ii) and 0.459 of the Federal Communications Commission's rules, Zipline International Inc. ("Zipline") requests that portions of the attached application be kept confidential to avoid release of sensitive and controlled product information to the public.¹

Zipline requests that the following information be withheld from public inspection:

Short-Term Confidentiality Requested	Permanent Confidentiality Requested	Exhibit
X		External Photos
X	X	Operation Description
X	X*	User's Manual (will not be available to consumers)
X		Test Setup Photos

Zipline has expended substantial effort in developing this product, which is one of the first of its kind. If the relevant information in the application were publicly disclosed, Zipline would likely suffer competitive harm and financial hardship.

Permanent Confidentiality

Zipline requests that the exhibits above for which permanent confidentiality is requested be permanently withheld from public inspection. These materials contain trade secrets and proprietary information not customarily released to the public. Additionally, these exhibits contain trade secrets that are not generally known or reasonably ascertainable.

Short-Term Confidentiality

Zipline requests that the exhibits above for which short-term confidentiality is requested be withheld from public inspection for a period of 180 days from the date of the grant of this equipment authorization to avoid premature release of sensitive information prior to marketing or release of the product to the public. Zipline is also aware that it is responsible for notifying HCT America in the event information regarding the product is made available to the public. HCT America will then release the documents listed above for public disclosure pursuant to FCC Public Notice.²

¹ 5 U.S.C. § 552(b)(4); 47 C.F.R. §§ 0.457(d)(1)(ii), 0.459.

² See *OET Equipment Authorization System Upgrade Permits Electronic Submittal of Short-Term Confidentiality Requests*, Public Notice, 19 FCC Rcd 10647 (2004).

Request for Return of Materials if Confidentiality is Denied

Zipline requests HCT America return all materials related to this application without consideration if the requests for confidentiality should be denied.

Sincerely,

Arvind Sathe
Arvind Sathe, Certification Manager