

Confidentiality Letter

April 26, 2016
ITP-16-F109

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

Re: Class II Permissive Change Application for Panasonic Single Modular under
FCC ID: ACJ9TGWL13A / Certified Under FCC Parts 15B, 15C and 15E
For Installation within Panasonic Personal Computer, Model FZ-M1

To whom it may concern:

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's rules (47 CFR §§ 0.457, 0.459), we are requesting the Commission to withhold the following attachments as **permanent confidential** document from public disclosure.

- Theory of Operation

Above mentioned document contains detailed system and equipment description are considered as proprietary information in operation of the equipment. The public disclosure of above documents might be harmful to our company and would give competitor an unfair advantage in the market.

Pursuant to provisions in Sections 0.457 and 0.459 of the Commission's Rules (47 CFR §§0.457 and 0.459) and DA 04-1705, we request a 45 day **short-term confidentiality**¹, starting from the date of grant, for the below indicated exhibits. These exhibits contain pre-market information, which could give our competitors unfair advantage should this information be released before this product is actually introduced into the marketplace.

- Test Setup Photos

Above mentioned document contains detailed system and equipment description are considered as proprietary information in operation of the equipment. The public disclosure of above documents might be harmful to our company and would give competitor an unfair advantage in the market.

Panasonic also acknowledges that we will provide appropriate notice to ULVS should either of the following occur.

- If we require additional 45 day extension period, we will notify ULVS with a new request letter at least seven days prior to the short-term confidentiality expiration date [Note: up to a maximum of 3 extensions only allowed], or
- We will immediately notify ULVS in the event the information regarding the product or the product is made available to the public. ULVS will then release the documents listed above for public disclosure, pursuant to FCC Public Notice DA 04-1705.

Sincerely yours,



Richard Mullen
Group Manager
Panasonic Corporation of North America
Product Safety & Compliance Department

¹ KDB 726920 D01 v01r01 dated May 5, 2015 gives details, which allows extending short-term confidentiality from the initial 45 day request up to a maximum of 180 day request.