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Date: 01/31/2020

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046

Subject: Request for Permanent Confidentiality

To whom it may concern:

In accordance with 47CFR Section 0.457 and Section 0.459 pertaining to confidential material, Honeywell hereby requests to hold permanently confidential all information identified below submitted pursuant to radio equipment certification requirements for FCC ID: AOIRDR7000, as follows:

(1) The specific information for which confidential treatment is sought:

1. All Schematics
2. Operational Descriptions
3. Block Diagrams
4. Parts Lists

(2) The Commission proceeding in which the information is being submitted:

FCC ID: AOIRDR7000

(3) The information is commercial or financial, contains trade secrets and is otherwise privileged:

Honeywell International has spent substantial effort in developing this product and it is one of the first of its kind in the industry. The above material contains trade secrets and proprietary information as specified by 47CFR 0.457(d) and technical data, which Honeywell guards from competitors.

(4) The information concerns a service that is subject to competition:

(5) Disclosure of the information could result in substantial competitive harm:

Allowing the subject information to become readily available to the public or Honeywell's competitors would negate the advantage Honeywell has achieved by developing this one-of-a-kind product. The public disclosure of this information would be harmful to our company and provide unjustified benefits to our competitors. A failure to treat as confidential the details of the design will result in financial hardship to Honeywell.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

Honeywell maintains policies and procedures to ensure that its confidential, proprietary, and trade secret information—including the information that is the subject of this request—is not disclosed

outside the company except under an appropriate non-disclosure agreement or other indication of confidentiality (such as 47CFR Section 0.457 and Section 0.459).

(7) The information that is the subject of this request is not available to the public and Honeywell has not shared the information that is the subject of this request outside the company except under an appropriate non-disclosure agreement or other obligation of confidentiality (such as 47CFR Section 0.457 and Section 0.459)

(8) The material should permanently not be available for public disclosure.

Sincerely,



Dawn Gidner  
Honeywell Avionics FCC Focal