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Federal Communications Commission  
7435 Oakland Mills Road  
Columbia MD 21046

Subject: Request for Confidentiality

FCC ID: C06-CK-CLS-B

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 confidential documents from public disclosure.

**Long-Term Confidentiality:**

We have requested that the following documents required to be submitted with this application be withheld from public disclosure indefinitely.

- Schematic Diagram
- Block Diagram
- Operational Description
- Parts lists
- Antenna Specification
- Internal Photos
- User Manual

These documents contain system and equipment descriptions and related information about the product, which our company considers to be proprietary, confidential, and a custom design and otherwise, would not release to the general public.

The circuit board and internal components are not accessible to users and are encapsulated in a hard case which is secured shut by proprietarily designed fasteners specially made for our company. The hardware and software of the device are licensed, not sold and are subject to an End User Licence Agreement (EULA) which prohibits the end user from opening the hard case or accessing of the internal hardware comprising the product. Internal Photos are not released to the public in any form. The device will not be accessible to the public. Our product is installed on or around critical infrastructure as part of the security system and is not accessible to the general public. The radars are placed at the top of large poles and behind fences. The User Manual contains proprietary technical information intended only for professional technicians obligated under an NDA with our company. Our products are only to be commissioned and serviced by personnel who have been trained and certified by us or a licensed system integrator. Training consists of the user's manual, training videos, or in-person demonstrations and installations on how to optimize the setup and installation of the device for best use. Security personnel never have internal access to the radar and are required to accept the End User License Agreement (EULA) in order to operate the radar. The general public therefore does not have access to an internal view of our product and the user's manual.

Because the design is a basis for future technological products, we feel that the public disclosure of the above documents would be harmful to our company and would give our competitors an unfair advantage in the



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market. Any exhibit or information for which we have requested long-term confidentiality, but which may not be accorded such treatment by the FCC, should be returned to us.

**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, we are requesting the commission to grant our short-term confidentiality request on the following attachments for a period of 180 days after grant is issued:

- External Photos
- Test Setup Photos

It is our understanding that all measurement test reports, FCC ID label format and correspondent during certification review process cannot be granted as confidential documents and that information will be available for public review once the grant of equipment authorization is issued.

Best Regards,

A handwritten signature in blue ink that reads "Daniel Wilkinson".

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Daniel Wilkinson

General Counsel

SpotterRF, LLC

5 September 2019