

Pace Americas
310 Providence Mine Road
Nevada City, CA 95959
Tel: 530 274 5400
Fax: 530 273 6340



November 28, 2012

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Confidentiality Request for FCC ID: PGRHR44

Pursuant to FCC 47 CFR 0.457(d) and 0.459 and IC RSP-100, Section 10, the applicant requests that a part of the subject FCC/IC application be held confidential.

Type of Confidentiality Requested	Exhibit
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent
<input type="checkbox"/> Short Term	<input type="checkbox"/> Permanent* ¹
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent
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<input type="checkbox"/> Short Term	<input type="checkbox"/> Permanent
<input checked="" type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent*

Pace Americas has spent substantial effort in developing this product and it is one of the first of its kind in industry. Having the subject information easily available to "competition" would negate the advantage they have achieved by developing this product. Not protecting the details of the design will result in financial hardship.

Permanent Confidentiality:

The applicant requests the exhibits listed above as permanently confidential is permanently withheld from public review due to materials that contain trade secrets and proprietary information not customarily released to the public.

Short-Term Confidentiality:

The applicant requests the exhibits selected above as short term confidential be withheld from public view for a period of 180 days from the date of the Grant of Equipment Authorization and prior to marketing. This is to avoid premature release of sensitive information prior to marketing or release of the product to the public. Applicant is also aware that they are responsible to notify ACB in the event information regarding the product or the product is made available to the public. ACB will then release the documents listed above for public disclosure pursuant to FCC Public Notice DA 04-1705.

Sincerely,

Mark A. Rieger
Sr. Regulatory Compliance Engineer
Pace Americas
310 Providence Mine Road
Nevada City, CA 95959
Mob: 530.575.6010
Tel: 530.274.5440
Fax: 530.273.6340
mark.rieger@pace.com