



PARKEON

Parc La Fayette
6 rue Isaac Newton
25075 Besançon cedex 9 - France
Tél : +33 (0)3 81 54 56 00
Fax : + 33 (0)3 81 52 76 38

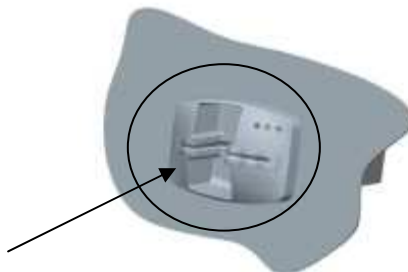
Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046
U.S.A.

Subject: Justification for hold Internal Photos under long-term confidentiality

Applicant: PARKEON
Product: EPSUM C40 C-less
Model: EPSUM C40 C-less
FCC ID: T2X-C40-C-LESS

Dear Sir/Madam,

ESPUM C40 Cless is a non-consumer device; it is inaccessible to the general public (except slot for bank card insertion (see picture below). Access to the device is only possible for authorized technician.



Access to the general
public

EPSUM C40 C-less is a contactless and credit card payment system. It contains banking applications and datas. In order to prevent banking pirating, internal photos mustn't be seen by people.

The device is inaccessible to the general public because it is mounted inside Parkeon's machines (Parking terminal, Ticket vending Machine, Automatic fare collection, OffStreet Parking). Parkeon's Machines are designed to resist to fraud and vandalism: they have a steel case; access to inside of machines is secured by control access; only authorized technician could access to the interior of the machine (and access to the device).

Moreover ESPUM C40 C-Less is protected against vandalism and bank pirating: If the device is removed of the machine: the device becomes inactive and unserviceable.

In the same way, if somebody disassembles ESPUM MR40, it becomes inactive and unserviceable. To prevent that somebody see where sensors are localised, internal photos mustn't be seen by people.



For this reasons, we want that internal photos be held under long term confidentially.

If you have any queries, please do not hesitate to contact us by our:

- Phone: +33 (0)381544874
- E-Mail: sbouriot@parkeon.com

Best Regards,

Sylvain Bouriot
R&D Electronic Engineer
PARKEON