

PISA Headquarters

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2012, February the 9th

Mrs. Evelyn Cherry
Office of Engineering and Technology
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Certification Application FCC ID UFW-HR2000NA

Dear Mrs.Cherry:

The above-referenced application, filed by IDS Ingegneria dei Sistemi SpA, Inc., seeks certification for a ground-penetrating radar (GPR) device. The application shows compliance with the Commission's Rules and does not require waivers.

When submitting the application, we have requested that certain photographs showing the interior of the devices be withheld from public disclosure.

The Commission has previously granted confidentiality under similar conditions to several applications concerning these GPR devices: e.g.

FCC ID QF750400 EA640311
FCC ID QF762000 EA291754
FCC ID QF75103A EA870041
FCC ID QLA250MHZ EA586775
FCC ID QLAMID EA364767
FCC ID QLA500MHZ EA369105
FCC ID QLA800MHZ EA813498

FACTUAL BASIS FOR CONFIDENTIALITY REQUEST

In the original request for Confidentiality, we have pointed out that these photographs showing the interior of the device contain trade secrets and proprietary information and are not customarily released to the public. The public disclosure of this information might be harmful to the company and provide unjustified benefits to our competitors.

Particularly, the antenna pictured in the document “HR2000NA internal pictures.pdf” is a sealed and potted unit that cannot be opened after manufacturing without destroying the contents.

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The unit will not be made available for sale to the general public. Marketing will be limited to law enforcement, fire fighting, emergency rescue, scientific research, commercial mining, and construction pursuant to CFR 47, Part 15, Subpart F, 15.509

In the message sent on 20012, February the 8th (Correspondence Reference Number: 41167), You are objecting that internal photos of a consumer device may be held confidential when the circuit board is enclosed in epoxy or in a material that would destroy the circuit board if removed or if the device is sealed and disassembly would destroy the product (Ref. FCC Publication No.726920 D02 Confidentiality Procedures dated 12/21/2011).

On this respect, we are submitting, as a separate exhibit, a revised version of the file "HR2000NA internal pictures.pdf", including the pictures of the potted circuit boards and the material used for potting those boards (polyurethane resin).

Respectfully submitted



Guido Manacorda
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