

20430 Century Boulevard Germantown, MD 20874 240-686-3300 240-686-3301 (Fax)

## Request for Confidentiality

December 13, 2012

American Certification Body, Inc. 6731 Whittier Avenue Suite C110 McLean, VA 22101

To Whom It May Concern:

Subject: Confidentiality Request for: FCC ID# UQR-CMDCSTM3 and IC ID# 8863A-CMDCSTM3

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

| Type of Confidentiality Requested Exhibit |             |   |
|---|-------------|---|
| Short Term                                | Permanent   | Block Diagrams                            |
| Short Term                                |             | External Photos                           |
| Short Term                                | Permanent*3 | Internal Photos                           |
| Short Term                                | Permanent   | Operation Description/Theory of Operation |
| Short Term                                | Permanent   | Parts List & Placement/BOM                |
| Short Term                                | Permanent   | Tune-Up Procedure                         |
| Short Term                                | Permanent   | Schematics                                |
| Short Term                                |             | Test Setup Photos                         |
| Short Term                                | Permanent*  | User's Manual                             |

\*Note: None

<u>Comtech Mobile Datacom Corporation (CMDC)</u> 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 be permanently withheld from public review due to materials that contain trade secrets and proprietary information not customarily released to the public.

<sup>&</sup>lt;sup>3</sup> - The asterisked items (\*) require further justification before permanent confidentiality will be allowed. These also currently require review by the FCC under their Permit-But-Ask policy before the grant is issued and can delay completion of an application. Further justification should be added to the note above. One such example for a potted device would be: "The EUT is FULLY potted using a non-removable epoxy based material. Removal of potting material causes irreparable damage to internal circuitry. See photographs exhibits that outline the device before and after potting."



20430 Century Boulevard Germantown, MD 20874 240-686-3300 240-686-3301 (Fax)

## Request for Confidentiality

Page 2

Short-Term Confidentiality:

The applicant requests the exhibits selected above as short term confidential be withheld from public view for a period of (not-to-exceed 180)<sup>4</sup> 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.

NOTE for Industry Canada Applications:

The applicant understands that until such time that IC distinguishes between Short Term and Permanent Confidentiality, either type of marked exhibit above will simply be marked Confidential when submitted to IC.

Sincerely,

By: Greg Handermann

(Print name)

Senior Vice President, Government Programs

(Title)

Please refer to <a href="http://acbcert.com/documents/misc-docs/Memo-Short-Term-Vs-Standard-Confidentiality.pdf">http://acbcert.com/documents/misc-docs/Memo-Short-Term-Vs-Standard-Confidentiality.pdf</a> for complete details.