

Sept 23, 2024

Nemko North America, Inc.
 303 River Road
 Ottawa, Ontario, Canada
 K1V 1H2
 Attn: Director of Certification

REQUEST FOR CONFIDENTIALITY - FCC

FCC ID: XGS-GT12BT

Pursuant to FCC 47 CFR [0.457](#)(d)(1)(ii) and [0.459](#) and FCC guidance published in [KDB 726920](#), we hereby request confidential treatment of information accompanying this application as outlined below. We request the exhibits selected below as **long term confidential (LTC)** be withheld from public view permanently:

Selection of exhibits for LTC - general	Exhibit name
☒ Permanent (Long Term)	Block Diagrams
☒ Permanent (Long Term)	Operation Description / Theory of Operation
☒ Permanent (Long Term)	Parts List & Placement / BOM
☒ Permanent (Long Term)	Schematics
Selection of exhibits for LTC - specific ¹	Exhibit name
☐ Permanent (Long Term)	
Selection of exhibits for LTC (with NDA) ³	Exhibit name
☐ Permanent (Long Term)	

We also request the exhibits selected below as **short term confidential (STC)** be withheld from public view for a period of 180 days⁴ 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:

Selection of exhibits for STC ⁵	Exhibit name
☐ Short Term	Block Diagrams
☐ Short Term	Operation Description / Theory of Operation
☐ Short Term	Parts List & Placement / BOM
☐ Short Term	Schematics
☐ Short Term	User's Manual
☐ Short Term	Internal Photos
☒ Short Term	External Photos
☒ Short Term	Test Setup Photos
☐ Short Term	Tune-Up Procedure (for Licensed equipment only)

Our company has spent a substantial effort in developing this product and it is one of the first of its kind in the 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.

When the device is marketed before the requested number of days listed above, the grantee will inform the TCB to release the Short-Term Confidentiality information withheld on the FCC equipment authorization website.

¹ - Tune up procedure is applicable only for licensed equipment.

² - The FCC rules require that any radio, in which the software is designed or expected to be modified by a party other than the manufacturer that would affect the operating parameters of frequency range, modulation type, maximum output power or other radio frequency parameters outside the range under which the transmitter has been approved in accordance with the FCC rules, must be certified as a software-defined radio (SDR).

³ - These items require further information to be provided to TCB before permanent confidentiality will be extended to these exhibits. Please refer to FCC [KDB 726920](#) and review section II, 3) regarding specific information (NDA) that must accompany these requests.

⁴ - Number of days can be listed up to 180 but should not go past the date of beginning of product marketing/sale.

⁵ - Any exhibits that may have already been requested to have "Permanent" confidentiality need not be repeated under Short-Term confidentiality request.



The above information contains trade secrets and proprietary information not customarily released to the public. The public disclosure of this information might be harmful to the applicant and provide unjustified benefits to its competitors. The Applicant understands that pursuant to Rule [0.457\(d\)\(1\)\(ii\)](#), disclosure of this Application and all accompanying materials will not be made before the date of the Grant for this Application.

Sincerely,

Signed: 

Printed name: Walter Sonnenfeldt

Title: VP Regulatory Affairs

Company: ORBCOMM License Corp.

