



Request for Confidentiality

Date: April 18, 2016

Subject: Confidentiality Request for: FCC ID XGS-ORBCOG2BAM1 & IC ID:11881A-ORBCOG2BAM1

Pursuant to FCC 47 CRF 0.457(d) and 0.459 and IC RSP-100, Section 6.4, ORBCOMM, the applicant, requests that a part of the subject FCC application be held confidential.

Type of Confidentiality Requested Exhibit

Item / Exhibit	Short term confidential	Long /Permanent Term confidential	Note
Block Diagrams		yes	
Schematics		yes	
Operation Description/Theory of Operation		yes	
Tune-up procedure		yes	
Test –setup Photos	yes		
User Manual	yes		
Internal photos	yes		
External photos	yes		

Note - 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."

ORBCOMM 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.





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 Nemko Canada Inc.(Nemko) in the event information regarding the product or the product is made available to the public. Nemko 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: _____

A handwritten signature in blue ink, appearing to read 'Xinming Wang', written over a horizontal line.

Xinming Wang
Manager, Hardware Design Engineering
ORBCOMM

