

REQUEST FOR CONFIDENTIAL TREATMENT

Pursuant to 47 C.F.R. § 0.459 — Supporting FCC Form 442

Applicant	KMB Telematics Inc.
FRN	0030628945
Date	August 6, 2026

1. Request and Identification of Materials (§ 0.459(b)(1), (2))

KMB Telematics Inc. (“Applicant”) requests that the document titled “Confidential Technical Annex” accompanying its Form 442 application be withheld from public inspection. No confidential treatment is sought for any other part of the application. The annex comprises: (i) the transmit antenna type, aperture, beamwidths, and pattern data; (ii) transmit chain characteristics, including synthesizer phase noise and power amplifier gain, noise figure, harmonic and spurious content; (iii) the transmit filter configuration and component specifications; and (iv) waveform timing parameters. These are the engineering characteristics from which the emission analysis in the public exhibits is derived, supplied so that Commission staff may verify that analysis.

2. Commercial Nature, Competition, and Competitive Harm (§ 0.459(b)(3), (4), (5))

Applicant designs, manufactures, and sells millimeter-wave radar sensors commercially, in a market in which multiple manufacturers actively compete to supply sensors of this class for the same applications. The withheld material is the engineering characterization of its product’s transmit design — the product of Applicant’s privately funded development and a category of technical information recognized by 47 C.F.R. § 0.457(d) as customarily withheld. Disclosure would materially assist a competitor in reconstructing Applicant’s design approach without comparable investment, and would diminish the value of the product to customers, including prospective government customers, for whom the undisclosed character of its design (e.g. to potential adversaries) is itself of value.

3. Prior Disclosure and Customary Treatment (§ 0.459(b)(6), (7))

The information in the Confidential Technical Annex has not been published. Within Applicant it is restricted to personnel with a need to know, and documents containing it carry proprietary markings. The sole disclosure outside Applicant has been to the Bureau of Industry and Security of the U.S. Department of Commerce in support of an export license application, a submission protected from public disclosure by statute.

4. Public Interest (§ 0.459(b)(9))

The public interest in inspecting an experimental application lies in assessing interference potential and exposure compliance. Every parameter bearing on those questions is given in the public exhibits, including frequency, bandwidth, emission designator, power, EIRP, antenna gain, sites, pointing restrictions, the emission commitments, and the computed exposure boundaries. The public interest is

met by this description of “*what*” is being done without recourse to the Confidential Technical Annex, which is being provided to the Commission to describe “*how*” it is being done.

5. Duration and Conclusion (§ 0.459(b)(8))

Applicant requests that confidential treatment be maintained indefinitely, the competitive sensitivity of the material persisting for the commercial life of the product. Should the Commission be inclined to deny this request in whole or in part, Applicant requests notice and an opportunity to respond, and to withdraw the material, before any public disclosure, in accordance with § 0.459(e) and (g).

Respectfully submitted,

KMB TELEMATICS INC.

By: _____

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