



February 25, 2016

Attn: Application Examiner  
Federal Communication Commission  
Office of Engineering and Technology  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**RE: Request for Long-Term Confidentiality**  
**Applicant: SCA Hygiene Products AB**  
**FCC ID: 2ABK3-466200**

To Whom It May Concern:

SCA Hygiene Products AB (“SCA” or “Applicant”) hereby requests that the Federal Communications Commission (“Commission”) hold confidential certain portions of the application, as identified below for equipment certification for the referenced FCC identifiers. This request for long-term confidentiality is made pursuant to 47 C.F.R. §§ 0.457(d)(i) and 0.459 of the Commission’s Rules and Commission’s Guidance.<sup>1</sup> Pursuant to Section 0.459(b), Applicant requests long-term confidentiality based on the following facts:

Long-term confidentiality is sought to prevent disclosure of information pertaining to the referenced product to protect Applicant’s trade secrets. The disclosure of such information would result in substantial competitive harm to Applicant. Specifically, Applicant manufactures and sells hygiene products and dispenser systems (e.g., paper towel dispenser, soap dispensers, etc.) under its TENA<sup>®</sup> and TORK<sup>®</sup> brands. Applicant’s customer base includes companies within the industrial, commercial, healthcare, and hospitality industries. Applicant competes with a myriad of large manufacturers for these customers.

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<sup>1</sup> See FCC, Office of Engineering and Technology Laboratory Division, Equipment Authorization Confidentiality Request Procedures (Mar. 5, 2015), *available at* [https://apps.fcc.gov/kdb/GetAttachment.html?id=futAcYAsDlC9Ltc6aDmn6A%3D%3D&desc=726920%20D01%20Confidentiality%20Request%20Procedures%20v01r01&tracking\\_number=41731](https://apps.fcc.gov/kdb/GetAttachment.html?id=futAcYAsDlC9Ltc6aDmn6A%3D%3D&desc=726920%20D01%20Confidentiality%20Request%20Procedures%20v01r01&tracking_number=41731).

Svenska Cellulosa  
Aktiebolaget SCA (publ.)  
Box 200  
SE-101 23 STOCKHOLM  
SWEDEN

[www.sca.com](http://www.sca.com)

Applicant has invested considerable time and materials in research and development to produce the referenced product. Information pertaining to the referenced product, including development and production is trade secret; access to this information is limited to authorized SCA personnel. This information is not known to the public or reasonably ascertainable and Applicant has worked diligently to prevent any disclosure to third parties or unauthorized personnel. Disclosure of the confidential portions of this application to competitors would not only give SCA's competitors significant business advantages in developing similar products, but it would also disclose successful implementation of unpublished, leading-edge technology developed by Applicant.

Such information and materials, as identified below, that should be withheld from public inspection have not been made available to the public. The following application materials should be withheld from public inspection:

**Schematics**  
**Detailed Block Diagrams**  
**Detailed Operational/Functional Description**

Pursuant to Section 0.459(e), as these materials are being submitted voluntarily, Applicant requests that the Commission return the materials without consideration if this request for long-term confidentiality should be denied.

Please direct questions to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Allan Elfström".

Allan Elfström  
Lead Product Developer  
Global Hygiene Category  
SCA Hygiene Products AB  
allan.elfstrom@sca.com