

Federal Communications Commission  
Authorization and Evaluation Division

**Permanent Confidentiality Request Letter**

Date: June 6, 2022

Confidentiality Request for:  
**FCC ID: 2AD8UFA3UB01**

To Whom It May Concern,  
Pursuant to FCC 47 CRF 0.457(d) and 0.459, Section 10, Nokia Solutions and Networks requests that a part of the subject FCC and/or IC application listed below be held permanently confidential and permanently withheld from public review due to materials that contain trade secrets and proprietary information not customarily released to the public.

- **Exhibit 5**            **Tune-Up Procedure and Drive levels**
- **Exhibit 6**            **Block Diagram**
- **Exhibit 7**            **Complete Circuit Diagrams**
- **Exhibit 8**            **Instruction Book**
- **Exhibit 9**            **Internal Photographs of the Equipment**
- **Exhibit 10**          **Operating Description, Circuitry for Determining Frequency**
- **Exhibit NDA-**        **Non Disclosure Agreement**

Confidentiality of the User Manual is maintained by requiring that any party that is supplied a user manual must first sign a non-disclosure agreement. Currently only cellular system operators have access to these manuals. Internal photos are kept confidential by virtue of the fact that the end product is a non-consumer product, certified and housed in a sealed enclosure, and is only accessible by trained /approved maintenance personnel.

Further, the Applicant has spent substantial effort in developing this product, some aspects of which are deemed to be trade secret and proprietary. Having the subject information easily available to our competitors in this market would negate the advantage we have achieved by developing this product. Not protecting the details of the design will result in financial hardship.

Sincerely yours,



Signatory: Lee Klinkenborg  
Title: R&D Engineer – Regulatory Compliance  
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## **Agent Authorization Letter**

Date: June 6, 2022

We, **Nokia Solutions and Networks - OY**, declare that Raymond Johnson, Walter Majkowski, Steven Gordon and Qin Yu of Nokia Global Products Compliance Laboratory (GPCL) are authorized agents to sign applications pertinent to FCC and Industry Canada applications. These employees of Nokia Global Product Compliance Laboratory are authorized to make representations to the FCC, Industry Canada and their respective Telecommunications Certified Body (TCB) agents on our behalf.

I certify that submitted documents properly describe the device or system for which equipment certification is sought. I also certify that each unit manufactured, imported or marketed, as defined in FCC and Industry Canada's regulations will have affixed to it a label identical to that submitted for approval with this application.

For instances where our authorized agent signs the application for certification on our behalf, I acknowledge that all responsibility for complying with the terms and conditions for Certification, as specified by the TCB, still resides with Nokia Solutions and Networks.

I hereby certify on behalf of Nokia Solutions and Networks ("Applicant") that neither Applicant nor any party to the application (officers, directors, and 5% shareholders) is subject to a denial of Federal benefits that includes FCC benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988 21 U.S.C. 853a.

Sincerely yours,

A handwritten signature in blue ink, reading "Lee Klinkenborg". The signature is written in a cursive style and is positioned above a light blue horizontal line.

Signatory: Lee Klinkenborg  
Title: R&D Engineer – Regulatory Compliance  
Nokia Solutions and Networks  
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## Confidentiality Exhibit NDA

### LONG-TERM CONFIDENTIALITY FOR INTERNAL PHOTOS AND USER'S MANUAL

KDB 726920 D01 "Equipment Authorization Confidentiality Request Procedures" Section II 3) The internal photos and/or user's manual exhibits may be given Long-Term Confidentiality under the following special conditions:

a) Internal photos

1. May be held Confidential if the circuit board or internal components are not accessible to users. For example, it is acceptable if the circuit board is enclosed in epoxy.
2. Also, it is acceptable if the device is not accessible to the public, for example, a device mounted on the top of a large tower (or in a fenced enclosure) such that it is only serviceable by professional designated technicians under a Non-Disclosure Agreement (NDA). All sales for these devices must be under a NDA restricting the disclosure of the propriety information, including internal photos.

b) User's manual may be held Confidential only when the manual contains proprietary technical information intended for professional technicians obligated under a NDA. All sales and distribution of the user's manual must be under a NDA that restricts the disclosure of the information.

c) In the application cover letter requesting Long-Term Confidentiality the following additional description (in item 7) and the NDA exhibit is required:

1. Describe in detail how internal photos and/or user's manual information are controlled to prevent them from becoming public or disclosed to unauthorized persons.
2. Describe how public access is restricted for products serviceable by professional designated technicians.
3. A statement that all sales of the non-consumer device will be under a NDA to include third party sales and that the final user of the device is subject to the NDA.
4. Provide an example of the NDA between the grantee and a purchaser. The request for Confidentiality must include the key terms of the NDA to ensure consistency between the two.

#### Response

The internal photos and user's manual were requested for the long-term Confidentiality in the letter for Request of Permanent Confidentiality submitted in this application. The rationales for such request have been stated in the letter.

In accordance with the procedures specified above, a sample generic copy of the Nokia NDA between the grantee and a purchaser is attached. Additionally,

*The Nokia product, the subject of this application, is not subject to third party sales.  
The final user of the device is always a License holder/cellular operator.*