



8/13/17

Federal Communications Commission
Washington, DC 20554

Re: Request for Confidential Treatment

Dear Sir or Madame,

Pursuant to 47 C.F.R. §0.457(d) and 47 C.F.R. § 0.459, EVOLV TECHNOLOGIES, INC. hereby requests confidential treatment of portions of the enclosed Equipment Authorization Form 731 application and the exhibits attached thereto (collectively, the "Application"), which is being submitted electronically. In support of this request, EVOLV TECHNOLOGIES, INC. states as follows:

(1) Types of confidentiality being requested:

Item	Name	Description	Type of confidentiality
Exhibit A	Transmitted Power Schematic Overview.pdf	Detailed technical overview, schematics, and drawing of the equipment	Long Term
Exhibit B	Test Setup Photos	Detailed photos of tests performed on the Equipment	Short Term
Exhibit C	User's Manual	Manual to be provided to the end user	Short Term
Exhibit D	Internal Photos	Detailed photos of the internal components of the equipment	Short Term
Exhibit E	Operational Description (including EMC Regulatory Configuration Package Form Evolv Edge Rev 2.pdf)	Detailed description of the functional operation of the equipment	Long Term
Exhibit F	130-00001-Rev_02 Schematic.7z	Detailed technical schematics, and drawing of the equipment	Long Term
Exhibit G	Edge - Block Diagram Rev 3.pdf	Detailed block diagram of the equipment	Long Term

(2) Identification of the specific information for which confidential treatment is sought;

EVOLV TECHNOLOGIES, INC. requests that the Commission withhold from public inspection, and afford confidential treatment to, the information contained in Exhibits A through G of the Application (as listed in the table above), consisting of information regarding EVOLV TECHNOLOGIES, INC. device components (together, the "Confidential Material"). EVOLV TECHNOLOGIES, INC. requests that the Commission effect this request by withholding the entirety of Exhibits A through G from inspection.

(3) Identification of the Commission proceeding in which the information was submitted or a

description of the circumstances giving rise to the submission;

The Application is being submitted in response to the requirements imposed on EVOLV TECHNOLOGIES, INC. by the Commission in 47 CFR §§ 2.803(b).

- (4) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged;



The Confidential Material in Exhibits A, E, F, and G contains information regarding EVOLV TECHNOLOGIES, INC. device components. This information in these exhibits is commercially and competitively highly sensitive. Public disclosure of this information at any time could place EVOLV TECHNOLOGIES, INC. at a competitive disadvantage vis-a-vis its competitors and could damage EVOLV TECHNOLOGIES, INC. position in the marketplace.

The Confidential Material in Exhibits B, C and D contains information regarding the functionality and design of EVOLV TECHNOLOGIES, INC. product. This information is commercially and competitively highly sensitive until the product becomes available for sale to the public. Public disclosure of this information prior to the date of first commercial sale of the product could place EVOLV TECHNOLOGIES, INC. at a competitive disadvantage vis-a-vis its competitors and could damage EVOLV TECHNOLOGIES, INC. position in the marketplace.

- (5) Explanation of the degree to which the information concerns a service that is subject to competition;

The Confidential Material concerns EVOLV TECHNOLOGIES, INC. activities in the market for security devices. EVOLV TECHNOLOGIES, INC. is subject to robust competition from numerous existing and potential service providers. Participants in adjacent market segments - eg., personnel screening and security devices- apply additional competitive pressure.

- (6) Explanation of how disclosure of the information could result in substantial competitive harm;

As discussed above, the Confidential Material in Exhibits A, E, F, and G contains highly sensitive commercial and technical product information. EVOLV TECHNOLOGIES, INC. has a commercial interest in all of this information and would be harmed by its disclosure at any time. In particular, the disclosure of this information would provide competitors with unwarranted insights in to the technical configuration of the EVOLV TECHNOLOGIES, INC. devices and EVOLV TECHNOLOGIES, INC. product strategy and would facilitate the development of strategic and competitively harmful responses by those competitors.

As discussed above, the Confidential Material in Exhibits B, C, and D contains highly sensitive commercial and technical product information. EVOLV TECHNOLOGIES, INC. has a commercial interest in all of this information and would be harmed by its disclosure prior to the date of first commercial sale of the product. Such disclosure would provide competitors with unwarranted insights into the design and operation of the EVOLV TECHNOLOGIES, INC. devices and EVOLV TECHNOLOGIES, INC. product strategy and would facilitate the development of strategic and competitively harmful responses by those competitors.

- (7) Identification of any measures taken by the submitting party to prevent unauthorized disclosure;

The Confidential Material in Exhibits A, E, F, and G is not distributed, circulated, or provided to any party outside of EVOLV TECHNOLOGIES, INC. that is not bound by confidentiality obligations. EVOLV TECHNOLOGIES, INC. treats this information as highly sensitive information; thus only certain personnel within the company have access to it.

Until the date of first commercial sale of the product, the Confidential Material in Exhibits B, C, and D is not distributed, circulated, or provided to any party outside of EVOLV TECHNOLOGIES, INC. that is not bound by confidentiality obligations. EVOLV TECHNOLOGIES, INC. treats this information as highly



sensitive information; thus only certain personnel within the company have access to it.

- (8) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties;

The Confidential Material in Exhibits A, E, F, and G is not available to the public and has not previously been disclosed to third parties not bound by confidentiality obligations.

The Confidential Material in Exhibits B, C, and D is not available to the public and has not previously been disclosed to third parties not bound by confidentiality obligations.

- (9) Justification of the period during which the submitting party asserts that material should not be available for public disclosure; and EVOLV TECHNOLOGIES, INC. maintains that the Confidential Material in Exhibits A, E, F, and G should remain subject to confidential treatment indefinitely. Even historical data can be used to track trends or business decisions, and this information could then be used against EVOLV TECHNOLOGIES, INC.

EVOLV TECHNOLOGIES, INC. maintains that the Confidential Material in Exhibits B, C, and D should remain subject to confidential treatment for at least a period of 180 days from the date of the grant. This information, if made available to the public before the date of first commercial sale of the product, could be used to harm sales of EVOLV TECHNOLOGIES, INC. first ever commercial product.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Richard J. Abraham", with a long horizontal flourish extending to the right.

Richard J. Abraham
Evolv Technologies, Inc.