



PROJECT:

AVIATOR UAV
200**Addendum to Confidentiality Request: FCC rules 47 CFR 0.457 and 0.459
FCC ID: 2AS39-AVIATORUAV200**

Cobham Cape Town submitted a request for **long-term confidential treatment of all** of the information accompanying the FCC application as listed below, i.e.:

- 1) Block Diagrams
- 2) Schematic Diagrams
- 3) Part Lists
- 4) Internal Photos of the sealed antenna feed board subassembly affixed to the AVIATOR UAV 200
- 5) Operational Description

These materials contain trade secrets and proprietary information not customarily released to public and the public disclosure of these matters might be harmful to the Applicant and provide unjustified benefit to its competitors. The antenna feed board contains the integral antenna. Its design is an essential part of our intellectual property. We keep information on its design confidential. Thus, the information is not available in the public domain. As such, the details are not shown in marketing materials nor in manuals associated with the radio transceiver. This subassembly is attached to a mechanical part (the midplane) by means of screws. The midplane is a solid aluminium part except for four connector holes. The radome for the antenna subassembly is then bonded to the midplane with an epoxy. The radome that covers the antenna subassembly is optically opaque and can only be removed at the factory by cutting it off. The radome completely covers the antenna feed board. We are not seeking long-term confidentiality for the internal photographs of the other two circuit boards that make up the device (i.e. the modem board and the RF board) as those boards are accessible without destroying a portion of the device, unlike the antenna feed board. As such, we submit that the antenna feed board presents the sort of exceptional case discussed in KDB Publication 726920, Confidentiality Request Procedures, pertaining to long-term confidentiality for certain internal photos if the information shown on the photo is a circuit board or internal component not accessible to users.

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The subsequent correspondence with the FCC following the submission for Confidentiality Request was limited to the issue of keeping the internal photographs of the antenna array assembly confidential.

Reference for this correspondence was done under inquiry tracking number **322827**.

In conclusion, the FCC granted long term confidentiality of all documents listed above including internal photographs of the antenna array.

A copy of this latest response from the FCC staff with the request for confidential treatment is given below:

From: oetech@fcc.gov <oetech@fcc.gov>

Sent: Wednesday, August 7, 2019 2:28 PM

To: Hilliard, David <DHilliard@wileyrein.com>

Subject: Response to Inquiry to FCC (Tracking Number 322827)

Inquiry on 06/12/2019 :

Inquiry:

On behalf of Omnipless Manufacturing (PTY) Ltd, this is to request pre-approval guidance to accord long-term confidentiality with respect to the internal photograph of the sealed circuit board described in the attached request. If you have questions or require additional information, please contact David Hilliard as noted above. The device referred to in the attachment has not yet been submitted to a TCB.

FCC response on 06/13/2019

The long term confidentiality request is acceptable. However, there should be a non-disclosure agreement as an example, does not require signature between the two parties in question. This non-disclosure agreement is required in FCC Publication No. 726290 dated April 8, 2016.

---Reply from Customer on 06/20/2019---

The documentation associated with the device will make clear that the use of the equipment is subject to a confidentiality condition associated with the sealed cover that obscures viewing of the confidential information and that removal of the cover is prohibited. Please see attachment to this reply.

FCC response on 07/02/2019

The FCC is requesting the following information before we make a response to this request: questing : Photo's of the part that is requested to be confidential. Photo's of the cover/enlclosure and the epoxy enclosing the confidential part to determine if the confidential part would be destroyed if someone tried to open the cover and take photo's of the confidential part.

---Reply from Customer on 08/02/2019---

Please see attached confidential information responsive to the July 2, 2019, FCC response. Confidential treatment for the attached information is requested pursuant to Sections 0.457 and 0.459 of the FCC rules.

FCC response on 08/07/2019

Information submitted is acceptable.

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Form #: 875-A0067 iss 2.0

The non-disclosure agreement as suggested by the FCC in their response of 06/13/2019 has been included in the updated AVIATOR UAV 200 Installation Manual and is also given below:

Attachment Details:

[Documentation Excerpt re Nondisclosure](#)

<https://apps.fcc.gov/kdb/GetAttachment.html?id=5mOxtKRGIEOCi6yrl7tIHg%3D%3D>

Draft Manual – Confidential Until Released by Cobham

AVIATOR UAV 200
Installation Manual

COBHAM

5. MAINTENANCE

5.1 General

The AVIATOR UAV 200 does not require routine maintenance or adjustment apart from routine wiring installation checks.

Non-disclosure. By using the AVIATOR UAV 200 you recognize that the radome is not designed to be a removable part and agree not to attempt its removal by any means. It is permanently bonded in order to cover the antenna sub-assembly. The antenna sub-assembly also contains proprietary design information that may not be accessed or disclosed without the express written consent of Omnipless Manufacturing (PTY) Ltd.

5.1.1 Maintenance Intervals

There are no specified inspection intervals of the SATCOM system. Refer to Table 5-1 for information on inspection actions applicable to the AVIATOR UAV 200.

Table 5-1: Inspection tasks for AVIATOR UAV 200

Inspection	Action
Check the radome for cracks.	Return product to manufacturer (do not attempt to remove radome from the product)
Check SATCOM-to-mounting structure ground resistance.	Tighten mounting screws.
Check cabling for broken or frayed wires.	Replace the damaged wires.

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