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June 12, 2019

Federal Communication Commission
Equipment Authorization Division, Application Processing Branch
7435 Oakland Mills Road
Columbia, MD 21048
USA

**Re: Confidentiality Request: FCC rules 47 CFR 0.457 and 0.459
FCC ID: 2AS39-AVIATORUAV200**

Pursuant to Sections 0.457 (d)(l)(ii) and 0.459 of the Commission's Rules, the Applicant hereby requests **long-term confidentiality treatment of all** of the information accompanying this 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.

The Applicant understands that pursuant to Rule 0.457 (d)(I)(ii) disclosure of this Application and all accompanying documentation will not be made before the date of the Grant for this Application. Please contact me or our counsel David E. Hilliard of Wiley Rein LLC, dhilliard@wileyrein.com, 202-719-7058, with any questions concerning this request.

Sincerely,



SJ Spammer
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