



November 17, 2021

Ms. Vicki Albertson
Certification Manager
Element Materials Technology
Suite 400
6775 NE Evergreen Parkway
Hillsboro, Oregon 97124

**Re: Request for Confidentiality to Federal Communications
Commission**

Dear Ms. Albertson:

You have informed us that you are advising NAL Research Corporation (“NAL”) in connection with an application submitted to the Federal Communications Commission for equipment authorization for NAL’s Shout SP (Smartphone) telecommunications device that incorporates a version of Iridium Satellite LLC’s (“Iridium”) 9253P Module.

You have advised us that the NAL equipment authorization application will include Iridium intellectual property in the form of documentation concerning the Iridium Module and asked whether Iridium requests that NAL seek, to the extent permissible, confidentiality protection for Iridium’s intellectual property in the form provided to NAL.

Pursuant to the provisions of the FCC’s Rules 47 CFR Sections 0.457 and 0.459, and the policies adopted by the Office of Engineering and Technology of the FCC (KDB 726920 D01 V02), we are advising you that NAL must request Long-Term Confidentiality for certain confidential Iridium documents. These Iridium documents contain detailed system and equipment descriptions and are considered as proprietary information in connection with the operation of Iridium’s Module and related technology. The public disclosure of these documents would be harmful to Iridium and would give competitors an unfair advantage in the marketplace for telecommunications equipment and technology. These documents are:

- Schematic Diagram
- Block Diagram
- Parts List/Bill of Materials
- Operational Description

In addition to above mentioned documents, in order to comply with the marketing regulations in 47 CFR 2.803 and the importation rules in 47 CFR 2.1204, while ensuring that business sensitive information remains confidential until the actual marketing of newly authorized devices, we request that NAL seek Short-Term Confidentiality protection for the following Iridium information, if also contained in the documentation being provided to the FCC:

- External Photos
- Test Setup Photos
- Internal Photos
- User Manual

For a period of up to 180 days pursuant to KDB 726920 D01 V02.

It is our understanding that other documentation, including, but not limited to, all measurement test reports, FCC ID label format and correspondence during the certification review process, are not subject to confidentiality protections and we accept that such information, if it includes Iridium intellectual property, will be available for public review once the grant of equipment authorization

Sincerely,



Maureen C. McLaughlin
Vice President Public Policy
Iridium Satellite LLC