

WAYMO CONFIDENTIAL AND PROPRIETARY



Waymo LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

June 3, 2024

Federal Communications Commission
Office of Eng'g & Tech. Lab. Div. / UL Verification Services TCB
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Request for Confidentiality
FCC ID: 2AZKTRADE8C

To Whom It May Concern:

Pursuant to the provisions of 0.457 and 0.459 of the Commission's rules (47 C.F.R. §§ 0.457, 0.459), Waymo LLC ("Waymo") hereby requests confidential treatment for documents filed with the Commission in connection with the application for equipment authorization referenced above.

Permanent Confidentiality¹

Waymo requests that the Commission withhold the following documents from public viewing indefinitely:

- Block diagrams
- Electrical schematic diagrams
- Operational descriptions
- Internal photographs
- Antenna specifications
- User manual²

These documents reveal technical and design information that is protected by Waymo as confidential and proprietary trade secrets. This information is carefully guarded by Waymo and has only been disclosed to parties that are required to maintain its confidentiality and is not customarily disclosed to the public even after commercial release of a device. Furthermore, the device being authorized is not accessible to the general public and can only be serviced by the manufacturer and its authorized vendors, who are subject to confidentiality requirements. As a result, disclosure of this information by the Commission would harm Waymo by giving competitors an unfair advantage in an industry sector subject to fierce competition from multiple U.S. and non-U.S. third parties.

Short Term Confidentiality³

In addition to the above mentioned documents, and to ensure that business sensitive information remains confidential until the actual marketing of newly authorized devices, Waymo requests that the

¹ Pursuant to 726920 D01 Confidentiality Request Procedures v01r02, Federal Communications Commission Office of Eng. & Tech. Laboratory Div., Section II. at p. 2-3 (dated April 8, 2016).

² The user manual with respect to the instant device is entitled to long-term confidentiality because it contains references to proprietary technology and methods, and as indicated above, will only be accessible to discrete Waymo employees and third party partners subject to confidentiality agreements.

³ Pursuant to 726920 D01 Confidentiality Request Procedures v01r02, Federal Communications Commission Office of Eng. & Tech. Laboratory Div., Section III. at p. 3-4 (dated April 8, 2016).

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Commission withhold the following documents from public viewing for 180 days after the date the grant of authorization is issued:

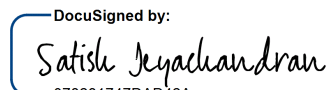
- External photographs
- Test setup photographs

These documents reveal technical and design information that has not been publicly disclosed in marketing materials and is protected by Waymo as confidential and proprietary trade secrets. This information has been disclosed to those required to maintain its confidentiality and is not customarily disclosed prior to the commercial release of the device. As a result, disclosure of this information by the Commission prior to commercial release would harm Waymo by giving competitors an unfair market advantage. Waymo believes the period of confidentiality requested is necessary to protect the information until the commercial release of the device.

It is our understanding that measurement test reports and FCC ID label format cannot be granted as confidential documents and this information will be available for public review once the grant of equipment authorization is issued.

Should the Commission deny the instant request for confidentiality, Waymo requests that the above-referenced documents be returned without consideration pursuant to Section 0.459(e) of the Commission's rules.

Sincerely,

DocuSigned by:

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Satish Jeyachandran
VP of Engineering
Waymo LLC