

## Request for Permanent & Short-Term Confidentiality

March 9, 2021  
MSBD-20-F007

UL Japan, Inc.  
Consumer Technology Division  
4383-326 Asama-cho, Ise-shi  
Mie, 516-0021, Japan

Subject: Original Limited Single Modular Approval for Panasonic RFID Module, Model RI20A  
under FCC ID: ACJ9TGRI20A  
For Installation within Panasonic RFID Accessory, Model FZ-VRFG211

To whom it may concern:

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's rules (47 CFR §§ 0.457, 0.459), we are requesting the Commission to withhold the following attachments as **permanent** confidential document from public disclosure.

- Theory of Operation
- Block Diagram
- Schematics

Above mentioned document contains detailed system and equipment description are considered as proprietary information in operation of the equipment. The public disclosure of above documents might be harmful to our company and would give competitor an unfair advantage in the market.

In addition, please be advised that Panasonic Corporation of North America hereby requests the following filed sensitive information to be held under **short-term** confidential, pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's Rules and the provisions in FCC Public DA 04-1705. We request temporarily confidentiality of **45 days**, starting from the original issued Certification grant date.

- External and Internal Photographs
- Operating Instructions (User's Manual)
- Test Setup Photographs

Panasonic also acknowledges that we will provide appropriate notice to UL Japan should either of the following occur.

- If we require additional 45-day extension period, we will notify UL Japan with a new request letter at least seven days prior to the short-term confidentiality expiration date [Note: up to a maximum of 3 extensions only allowed], or
- We will immediately notify UL Japan in the event the information regarding the product or the product is made available to the public. UL Japan will then release the documents listed above for public disclosure, pursuant to FCC Public Notice DA 04-1705.

Sincerely,



Ben Botros  
Manager – Regulatory & Compliance  
Panasonic Corporation of North America