

**REQUEST FOR CONFIDENTIALITY**

[Reference Document: FCC KDB# # 726920 D02 Confidentiality Procedures Detail v01]

**NOTE:** If you do not require confidentiality your exhibits are visible on the FCC website for everyone.

A request for confidentiality must be indicated in item 8 of the 731 form and a letter making specific request for confidentiality must accompany the application as a separate exhibit. This letter must state exactly which portions of the application are to be held in confidence and for what specific reason.

Exhibit types that are commonly held confidential are:

- (1) schematic diagrams,
- (2) detailed block diagrams,
- (3) detailed operational descriptions,
- (4) parts lists, and
- (5) tune up procedures (if applicable).

Internal photos and user's manual exhibits, while not typically held confidential, may be eligible for long confidentiality in certain circumstances. Additional justification must be provided in these cases:

**(6) Internal Photos**

(may be held confidential when i.e.

- the circuit board is enclosed in epoxy or some sort of material that would destroy the circuit board if it was removed;
- the device is sealed using special fasteners that cannot be opened using common hand tools or if the PCB's are completely potted;

→ Provide photos justifying the attestation.

→ Provide justification as to how the device is sealed and how disassembly would destroy the product and circuit board.

**(7) Users manuals**

(may be held in confidence when i.e.

- the manual will only be available to licensed or specially trained personnel.
- the manual is very technical and is not provided to the consumer because the consumer cannot service the device

→ Submit an agreement such as a non-disclosure agreement, purchase agreement or installation agreement, between the grantee and the purchaser that is consistent with the submitted confidentiality request with regard to the internal photos, manual or any installation requirements such as located in an inaccessible area. The agreement should be on company's letter head. If applicable, the agreement should indicate how the purchaser will install the device and how the internal photo(s) or manual will not be given to the public

The FCC is a federal agency and as such has duties to the public to disclose information made known to it (see 47 CFR 0).

The FCC has a procedure to handle confidential items and any request will be delivered to the FCC for them to decide if it can be held in confidence (PBA procedure).

**A request for confidentiality does not guarantee that the FCC will grant it.**

Please find below a sample letter for confidentiality request.

# Timecode Systems

GENERATE. SYNC. SHARE

Federal Communications Commission  
Equipment Authorization Branch  
7435 Oakland Mills Road  
Columbia, MD 21046

3/30/2022

## Request for Permanent Confidentiality

**Company name:** Timecode Systems Ltd  
**FCC ID:** AYV-AGLU02  
**FCC Part 15 Certification**

Gentlemen,

In accordance with CFR 47 § 0.457 and CFR 47 § 0.459 Timecode Systems Ltd hereby requests confidentiality of following attachments:

- (1) schematic diagrams,
- (2) detailed block diagrams,
- (3) detailed operational descriptions,
- (4) parts lists.

These documents contain detailed system and equipment description and related information about the product which Timecode Systems Ltd considers to be proprietary, confidential and a custom design and otherwise would not release to the general public. Since the design is a basis from which future technological products will evolve, Timecode Systems Ltd considers that this information would be of benefit to its competitors and that the disclosure of the information in these documents would give competitors an unfair advantage in the market.

Sincerely,



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Signature

Paul Scurrell  
CEO  
Timecode Systems Ltd  
Unit 6  
Elgar Business Centre  
Worcester  
WR2 6NJ  
UK