



July 30, 2021

TUV SUD Product Service Ltd.
 Octagon House, Concorde Way,
 Segensworth North, Fareham
 Hampshire, PO15 5RL,
 United Kingdom

Subject: Confidentiality Request for FCC ID: B66ACRPLB-400-425

Pursuant to Sections FCC 47 CFR 0.457(d)(2) and 0.459(a) & (b) of the Commission's Rules, the applicant requests that a part of the subject FCC application be held confidential.

Type of Confidentiality Requested		Exhibit
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Block Diagrams
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	Internal Photos
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Operation Description/Theory of Operation
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Tune-Up Procedure
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Schematics
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	User's Manual

ACR Electronics Inc. has spent substantial effort in developing this product and it is one of the first of its kind in industry. Having the subject information easily available to "competition" would negate the advantage they have achieved by developing this product. Not protecting the details of the design will result in financial hardship.

Permanent Confidentiality:

The applicant requests the exhibits listed above as permanently confidential be permanently withheld from public review due to materials that contain trade secrets and proprietary information not customarily released to the public.

Short-Term Confidentiality:

The applicant requests the exhibits selected above as short term confidential be withheld from public view for a period of 180 days from the date of the Grant of Equipment Authorization and prior to marketing. This is to avoid premature release of sensitive information prior to marketing or release of the product to the public. Applicant is also aware that they are responsible to notify TUV SUD Product Service Ltd. in the event information regarding the product or the product is made available to the public. TUV SUD Product Service Ltd. will then release the documents listed above for public disclosure pursuant to [FCC Public Notice DA 04-1705](#). of the Commission's policy, in order to comply with the marketing regulations in 47 CFR §2.803 and the importation rules in 47 CFR §2.1204

Sincerely,

Dan Stankovic
 Director of Test and Certification, Phone: (954) 862-2175, Dan.Stankovic@acrartex.com