

Date: May 31st, 2020

Federal Communications Commission Office of Engineering and Technology Laboratory Division 7435 Oakland Mills Rd. Columbia MD 21046

Subject: Request for Confidentiality

Ref: FCC ID numbers

Model(s)	FCC ID
A2481	BCG - E3994A
A2626	BCG - E3996A
A2628	BCG - E4029A
A2630, A2629	BCG - E4030A
A2482	BCG - E3997A
A2631	BCG - E3999A
A2633	BCG - E4031A
A2634, A2635	BCG - E4032A
A2483	BCG - E4000A
A2636	BCG - E4002A
A2638	BCG - E4033A
A2639, A2640	BCG - E4034A
A2484	BCG - E4003A
A2641	BCG - E4005A
A2643	BCG - E4035A
A2644, A2645	BCG - E4036A



## 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), Apple Inc. hereby requests confidential treatment for documents filed with the Commission in connection with the application for equipment authorization referenced above.

## **Permanent Confidentiality**

Apple Inc. requests that the Commission withholds the following documents from public viewing indefinitely:

- Block Diagrams
- Electrical Schematic Diagrams
- Technical Descriptions, Product Specifications
- Antenna Gain, Antenna Locations
- Tune-up Procedure
- Software Security Description

These documents reveal detailed technical and design information that is protected by Apple Inc. as confidential and proprietary trade secrets. This information has been disclosed to those required to maintain its confidentiality and is not customarily disclosed to the public even after commercial release of a device. As a result, disclosure of this information by the Commission would harm Apple Inc. by giving competitors an unfair advantage even after commercial release of the device.

## **Short Term Confidentiality**

In addition to the above mentioned documents, pursuant to 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, while ensuring that business sensitive information remains confidential until the actual marketing of newly authorized devices, Apple Inc. requests that the Commission withholds the following documents from public viewing for one hundred eighty days after the date the grant of equipment authorization is issued:

- External Photographs
- Internal Photographs
- Test Setup Photographs
- User Manual



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

Sincerely,

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Abhishek Rela.

Abhishek Rala Apple Inc. Global Certification Manager arala@apple.com