

**28 October, 2020**

Equipment Authorisation Division  
Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046

Ascom (Sweden) AB  
FCC Registration Number (FRN): 0013904214  
FCC IO: BXZNUCR  
Product Name: Card Reader US

Pursuant to Sections 0.457 and 0.459 of the commissions rules, we hereby request that the following documents be held confidential:

- Operational Description
- Block Diagram
- Schematics
- Parts Lists
- Tune Up Information
- HW Design Description

These documents contain detailed system and equipment description and related information about the product which Ascom (Sweden) AB considers being 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, Ascom (Sweden) AB 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.

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, Ascom 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

These documents reveal technical and design information that has not been publicly disclosed in marketing materials and is protected by Ascom (Sweden) AB as confidential and proprietary trade secrets. This information has been disclosed to those required to maintain its confidentiality 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 Ascom (Sweden) AB by giving competitors an unfair market advantage. Ascom (Sweden) AB believes

the period of confidentiality requested is necessary to protect the information until the commercial release of a device.

If you have any questions, please feel free to contact me at the address shown below.

Dated this 28 Day of October 20 20

By: *Bodil Tufvesson* Bodil Tufvesson  
Signature Printed

Title: Regulatory Affairs Engineer

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Applicant: Ascom (Sweden) AB