ACCO Brands, Inc.

To: Federal Communications Commission 7435 Oakland Mills Road Columbia, MD 21046

Subject: Request for confidentiality FCC ID: GV3M01174-D

Dear FCC TCB:

1. Long-Term Confidentiality

Pursuant to 47 CFR Section 0.459(a) & (b), we hereby requests non-disclosure and confidential treatment of the following materials submitted in support of FCC certification application:

Schematic

Block diagram

Operational description

Above materials contain secrets, proprietary and technical information, which would customarily be guarded from competitors under 47 CFR, section 0.457(d)(2). Disclosure or publication or any portion of this company confidential material to other parties could cause substantial competitive harm and provide unjustified benefits for competitors.

Short-Term Confidentiality (STC)

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, applicant hereby requests Short-Term Confidential treatment of the following materials:

Internal Photos

Planned Release Date STC: 180 days from date of grant

Justification: This document contains detailed system and equipment description is 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 unfair advantage in the market.

Sincerely,

Maggie Zhang

Sep 17, 2012