



Garmin International, Inc.
 1200 East 151st Street
 Olathe, Kansas 66062
 P: 913-397-8200 F: 913-397-8282

Date: April 5, 2018

SUBJECT: Confidentiality Request for FCC ID: IPH-03438/IC ID: 1792A-03438

Pursuant to FCC 47 CFR 0.457(d) and 0.459 and IC RSP-100, Section 9.4, 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		External Photos
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent* ¹	Internal Photos
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Operation Description/Theory of Operation
<input type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	Parts List & Placement/BOM
<input type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	Tune-Up Procedure
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Schematics
<input checked="" type="checkbox"/> Short Term		Test Setup Photos
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent* ¹	User's Manual

Garmin International, 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 90 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 ACB in the event information regarding the product or the product is made available to the

¹ - The asterisked items (*) require further information to be provided to ACB before permanent confidentiality will be extended to these exhibits. Please refer to FCC KDB 726920 and the specific Document link for D01 found at: <https://apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?switch=P&id=41731> and review section II, 3) regarding specific information that must accompany these requests.

public. ACB will then release the documents listed above for public disclosure pursuant to FCC Public Notice DA 04-1705.

NOTE for Industry Canada Applications:

IC currently only distinguishes Permanent Confidentiality exhibits as shown above. Short Term confidentiality is not considered applicable to IC applications.

Sincerely,

A handwritten signature in cursive script that reads "William H. Pertner".

William H. Pertner
Lead Compliance Engineer