



Rogers Labs, Inc.

4405 West 259th Terrace
Louisburg, KS 66053
913 837-3214

May 29, 2019

Re: Confidentiality request letter regarding applications for FCC ID: IPH-03559

IC: 1792A-03559

Applicant: Garmin International, Inc.
1200 East 151st Street
Olathe, KS 66062

Dear Sirs:

Pursuant to 47 CFR Sections 0.457 and 0.459 of the Commission's Rules and Canada RSP-100, Section 9.4, Garmin International, Inc. requests that the exhibits as referenced below be held confidential following grant of authorization.

FCC

Exhibit	Long Term Confidentiality	Short Term Confidentiality
Block Diagram	<input checked="" type="checkbox"/> Conf BlkDia	
Operational Description	<input checked="" type="checkbox"/> Conf OpDes	
Schematics	<input checked="" type="checkbox"/> Conf Scehm	
Tune Up Procedure	<input checked="" type="checkbox"/> Conf TunPro	
Parts List	<input type="checkbox"/> Conf PartsList	
External Photographs		<input checked="" type="checkbox"/> Short Term Conf ExtPho
Internal Photographs		<input checked="" type="checkbox"/> Short Term Conf IntPho
Test Setup Photographs		<input checked="" type="checkbox"/> Short Term Conf TSup
User Manuals		<input checked="" type="checkbox"/> Short Term Conf UserMan

ISED

Exhibit	Long Term Confidentiality	Short Term Confidentiality
Block Diagram	<input checked="" type="checkbox"/> Conf BlkDia	
Operational Description	<input checked="" type="checkbox"/> Conf OpDes	
Schematics	<input checked="" type="checkbox"/> Conf Scehm	
Tune Up Procedure	<input checked="" type="checkbox"/> Conf TunPro	
Parts List	<input type="checkbox"/> Conf PartsList	

Garmin International, Inc. has spent substantial effort in developing this product and design. 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.

Long-Term 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 the TCB in the event information regarding the product or the product is made available to the public. The TCB will then release the documents listed above for public disclosure pursuant to FCC Public Notice DA 04-1705.

NOTE for Industry Canada Applications: ISED currently only distinguishes Permanent Confidentiality exhibits as shown above. Short Term confidentiality is not considered applicable to the ISED applications.

Sincerely,

Scot Rogers