



Attention:  
Application Examiner

Re: Request for confidentiality

Applicant: Axell Wireless Limited

FCC ID: NEO-DFR-CELL-2780

To whom it may concern,

### **Permanent Confidentiality**

Request is hereby submitted by Axell Wireless Limited to withhold permanently from public review certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept permanently confidential:

- Schematics
- Detailed Block diagrams
- Detailed Operational/Functional Description (This is provided to the customer based on a non-disclosure agreement.)
- Parts list
- User manual
- Internal photos

Rationale for the request for confidentiality.

This equipment is a non-consumer device and is permanently mounted and sealed in areas that are not accessible to the general public. The user manual is highly technical and is only provided to the customer on a non-disclosure agreement. We attest to items 3 and 4 of the FCC confidentiality policies.

### Confidential policies

- 1) Internal photos of a consumer device may be held confidential when the circuit board is enclosed in epoxy or in a material that would destroy the circuit board if removed.
- 2) Internal photos of a consumer device may be held confidential if the device is sealed and disassembly would destroy the product.
- 3) Internal photos can also be held confidential if a non-consumer device is inaccessible to the general public, such as a device mounted on the top of a large tower (or in a fenced enclosure) that is only serviceable by the licensee or his designated technicians.
- 4) A user's manual may be held confidential when the manual is very technical and is not provided to the consumer because the consumer cannot service the device.



These materials contain trade secrets and proprietary information and are not customarily released to the public. Axell Wireless Limited has invested considerable time and materials in research and development to produce the referenced product. The public disclosure of the permanently confidential portions of this application to competitors would not only give them significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by us.

Sincerely,

A handwritten signature in purple ink, appearing to read "BB Barton".

Brian Barton  
Operations Support Director  
Axell Wireless Limited

08/11/2010