



Federal Communications Commission
Laboratory Division
7435 Oakland Mills Road
Columbia MD 21046

Date: January 31, 2013
Subject: Request for Confidentiality
FCC ID: **PKRNVWE362**

To Whom It May Concern:

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's rules (47 CFR §§ 0.457, 0.459), Novatel Wireless, Inc. ("Novatel Wireless"), requests that the Commission withhold the following attachments associated with the Class II permissive change to the above-referenced FCC ID from public disclosure indefinitely.

Regulatory WWAN Antenna Information
Block Diagram
Schematic Diagram

In support of this request, Novatel Wireless provides the following information:

- 1. Identification of the specific information for which confidential treatment is sought (§ 0.459(b)(1)):** Novatel Wireless requests that all of the information contained in above-referenced exhibits to the Class II permissive change application be withheld from routine public disclosure.
- 2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission. (§ 0.459(b)(2)):** The material is being submitted in connection with Novatel Wireless' Class II permissive change application for FCC ID PKRNVWE362.
- 3. Explanation of the degree to which the information is commercial, or financial or contains a trade secret or is privileged (§ 0.459(b)(3)):** The market for the technology that is the subject of the Class II permissive change application is a highly competitive one, with



numerous high tech companies competing for the business of potential customers. Were competitors of Novatel Wireless and our technology partner to become aware of the facts set forth in the above-referenced exhibits to the application at this time, it could have an adverse impact on Novatel Wireless' competitive standing and deprive Novatel Wireless and our technology partner of the marketplace benefit we otherwise might achieve by virtue of having product available before other competitors. If any of the information for which confidential treatment is sought were to be made publicly available, competitors of Novatel Wireless and our technology partner could reasonably determine the scope and status of our activities.

4. **Explanation of the degree to which the information concerns a service that is competitive (§ 0.459(b)(4)):** The technology that is the subject of the Class II permissive change application is subject to intense competition from other manufacturers and service providers who are developing competing services and technology.
5. **Explanation of how disclosure of the information could result in substantial competitive harm (§ 0.459(b)(5)):** As noted above, were competitors of Novatel Wireless and our technology partner to become aware of the facts set forth in the above- referenced exhibits to the application at this time, it could have an adverse impact on our competitive standing and deprive Novatel Wireless and our technology partner of the marketplace benefit we otherwise will achieve by virtue of having product available before other providers.
6. **Identification of any measures taken by the requesting party to prevent unauthorized disclosure (§ 0.459(b)(6)):** This information contained in the above- referenced exhibits to the Class II permissive change application has been strictly controlled by Novatel Wireless, with distribution limited to internal use only and for the specific purpose of conducting research, development, and testing of the technology.
7. **Identification of whether the information is available to the public and the extent of any previous disclosures of the information to any third parties (§ 0.459(b)(7)):** The information that Novatel Wireless requests be maintained as confidential is not available publicly. The information in the above-referenced exhibits to the Class II permissive change application has been carefully protected and kept confidential by limiting external contacts to privileged and confidential communications.
8. **Justification of the period during which the submitting party asserts that material**



should not be available for public disclosure (§ 0.459(b)(8)): Given the competitive nature of the marketplace, any disclosure that Novatel Wireless has developed the technology discussed in the above-reference exhibits to the Class II permissive change application would harm Novatel Wireless' competitive position. The information subject to this request for confidentiality should not be made available for public disclosure at any time.

In additional to above-referenced documents, pursuant to Public Notice DA 04-1705, 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, Novatel Wireless also requests that the Commission grant short-term confidential treatment and not release the following attachments for routine public disclosure for 45 days after the grant of this application.

User Manual
Test Setup Photos
Internal Photos
External Photos

For the time period of this short-term request, the reasons supporting confidential treatment are the same as those given in Points 3-8, above.

It is our understanding that test measurement reports and correspondence during the Class II permissive change review process cannot be granted confidential treatment and such information will be available for public review once the grant of equipment authorization is issued.

Best Regards,

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Date: Jan. 31, 2013