

Company Name: **Gemalto M2M GmbH**
Address: **Werinherstr. 81**
City: **81541 Munich**
Country: **Germany**

To: **Telefication B.V., Dept. FCC TCB**
Edisonstraat 12A
6902 PK ZEVENAAR
The Netherlands

Subject: Request for confidentiality FCC ID: **QIPALAS66A-US**

Reference number: #####

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:

- ☒ Bill(s) of Material ☒ Block Diagrams
☒ Operational Description ☒ Schematic Diagrams ☒ Tune-up Procedure

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.

2. 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 (note 1):

- ☒ Internal Photos ☒ User's Manual ☒ Test Set-up Photos ☒ External Photos

Justification: These items contain detailed system and equipment description and related information about the product which Gemalto M2M GmbH considers to be proprietary, confidential and a custom design which otherwise would only be released to qualified tech and is not released to the general public. Since this design is a basis from which future technological product will evolve, Gemalto M2M GmbH also feels that this information would be of benefit to its competitors, and that the disclosure of the information in these exhibits would give our competitors an unfair advantage in the market.

Planned Release Date STC: **30.06.2019** (notes 2, 3, 4, 5). If no date is given, 45 days from grant date will be used.

Date: **28.01.2019**

Name and signature of applicant: **Axel Heike – Certification Manager**

Notes:

- 1) A document or type of document can only have ONE type of confidentiality!
- 2) Short-Term confidentiality is in principle for 45 days from date of grant; it can be extended max 3 times (total time 180 days max.)
- 3) FCC must be informed when marketing begins earlier.
- 4) Release takes place automatically thus extension must be requested in time. Telefication does not remind you of this!
- 5) Request for extension or for release must be received by Telefication at least 7 days before date of actual marketing or before expiration of the STC period

