

- when it has to be **right**



Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Heerbrugg, 23 August 2018

Request for Short Term Confidentiality, intended to allow importation / distribution of authorized equipment while maintaining confidentiality before product launch

Company name: Leica Geosystems AG
FCC ID: RFD-BTWCO
FCC Part 15 Certification

Gentlemen,

In accordance with 0.457 and 0.459 of CFR 47, Leica Geosystems AG hereby requests for 'Short Term Confidentiality of all

- External Photos,
- Test Setup Photos,
- User's Manual,
- Internal Photos,

attachments for the subject application.

These documents contain detailed system and equipment description and related information about the product which Leica Geosystems AG considers to be proprietary, confidential and a custom design and otherwise would not release to the general public. Since the design is a basis from which future technological products will evolve, Leica Geosystems AG considers that this information would be of benefit to its competitors and that the disclosure of the information in these documents would give competitors an unfair advantage in the market.

Sincerely,

A handwritten signature in blue ink that reads "Gabriela Lang".

Gabriela Lang
Quality Engineering
Leica Geosystems AG

REQUEST FOR SHORT TERM CONFIDENTIALITY

If you do not request for short term confidentiality, your exhibits are visible on the FCC website for everyone from the first day the device is officially listed.

A request for short term confidentiality must be indicated in item 8 of the 731 form and a letter making specific request for short term confidentiality must accompany the application as a separate exhibit. This justification should:

- (a) reference Sections 0.457 and 0.459 which identify the information to be held confidential,
- (b) list the specific attachments to be held confidential, and (c) address why release of the information at the time of grant would be a problem.

Only one type of confidentiality can be applied per attachment exhibit (i.e. Permanent Confidential or Short-Term Confidential).

Only certain exhibits may be held in short term confidence.

- external photos,
- test setup photos,
- user's manual,
- internal photos;

if not included in the "Permanent confidentiality request":

- block diagrams,
- schematics,
- parts list / tune-up procedures,
- operational description

User's manuals will only be held in confidence under certain conditions such as when the manual will only be available to licensed or specially trained personnel. Internal photographs will only be held in confidence if the device is sealed using specially fasteners that cannot be opened using common hand tools or if the PCB's are completely potted.

General rules for short term confidentiality:

- Granted for 45 calendar day increments from the date of grant
- Maximum of four extensions from date of grant (180 days)
- Exhibits automatically released to the public at expiration date
- Release information to the public immediately when marketing begins

The FCC is a federal agency and as such has duties to the public to disclose information made known to it (see 47 CFR 0). The FCC has a procedure to handle short term confidential items and any request will be delivered to the FCC for them to decide if it can be held in confidence.

A request for short term confidentiality does not guarantee that the FCC will grant it.

Please find below a sample letter for short term confidentiality request.