

Request for Confidentiality

Date: 13 July 2016

Subject: Confidentiality Request for: UFW-AR600V24H10 8991A-AR600V24H10

Pursuant to FCC 47 CRF 0.457(d) and 0.459 and IC RSP-100, Section 10, the applicant requests that a part of the subject FCC application be held confidential.

Type of Confidentiality Requested		Exhibit
<input type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	Block Diagrams
<input type="checkbox"/> Short Term		External Photos
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent*	Internal Photos
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Operation Description/Theory of Operation
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Parts List & Placement/BOM
<input type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	Tune-Up Procedure
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Schematics
<input type="checkbox"/> Short Term		Test Setup Photos
<input type="checkbox"/> Short Term	<input type="checkbox"/> Permanent*	User's Manual

*Note: these materials contain trade secrets and proprietary information and are not customarily released to the public. The public disclosure of this information might be harmful to the company and provide unjustified benefits to our competitors.

The antenna pictured in the document "AR600V24H10- internal pictures.pdf" and the controller shown in the document "DAD internal pictures.pdf" are sealed and potted unit that cannot be opened after manufacturing without destroying the contents.

Specifically in order to view inside the product to which this request refers, one would have to carry out the following steps:

1. Use a special key to remove the screws securing the cover. This special key is not available to the general public. Moreover, these screws have to be removed in a specific order not to cause irreparable damages. The information on the removal order is available to IDS GeoRadar and to authorized repair centers only.
2. Inside the unit, electromagnetic absorbers cannot be removed without damage and will have to be replaced with new ones when re-assembling. This material is custom built and not available to the public or to a competitor.
3. De-solder the transmitter AND the receiver from the antenna flares to initiate access to certain electronics of the antenna. Then carefully disconnect and withdraw the assemblies from the shield /construct assembly. When these steps are done improperly the electronics can be severely damaged.

IDS GeoRadar has never released instructions on how to disassemble its units, and does not answer questions on how to do so. This information is kept internal to the company. If a unit arrives at the company's repair facility showing evidence of such tampering, the company does not repair it, but charges the customer for a new unit plus freight costs.

The Commission's posting of the photographs as well as of the schematics and components list, would allow a competitor to bypass this difficult and expensive disassembly. From the photographs, a competitor can also estimate:

1. the costs of manufacturing the printed circuit boards and mechanical housing;
2. the man-hours required to assemble the device;
3. any compatibility problems the manufacturer will have in designing new systems; and
4. the age of the electronic design (which gives valuable competitive information on upgrade and R&D efforts).

Access to interior photographs would almost permit a competitor to conduct a complete reverse engineering, to the point of producing a schematic.

We are also noting that The Commission has previously granted confidentiality under similar conditions to several applications concerning GPR devices: e.g.

QF7350HS
QF742600
QF7MINIXT
QLA450MHZHDR
QLA160MHZHDR
QLA750MHZHDR
QLA80MHZHDR

We are also reminding that the unit will not be made available for sale to the general public. Marketing will be limited to law enforcement, fire fighting, emergency rescue, scientific research institutions, commercial mining companies, construction companies and those parties providing services to these entities pursuant to CFR 47, Part 15, Subpart F, 15.509

Permanent 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 ___ (specify number of days not to exceed 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 ACB in the event information regarding the product or the product is made available to the public. ACB will then release the documents listed above for public disclosure pursuant to FCC Public Notice DA 04-1705.

NOTE for Industry Canada Applications:

The applicant understands that until such time that IC distinguishes between Short Term and Permanent Confidentiality, either type of marked exhibit above will simply be marked Confidential when submitted to IC.

Sincerely,
By:

 R&D Manager
(Signature/Title)

Guido Manacorda
(Print name)