



IDS GeoRadar s.r.l.
 Via A. Righi 6, 6A, 8
 56121 Pisa (PI)
 Italy
 T: +39 050.098.9300
 F: +39 050.7912.130
idsgeoradar.com

Federal Communications Commission
 7435 Oakland Mills Road
 Columbia, MD 21046
 USA

REQUEST FOR CONFIDENTIALITY - FCC

FCC ID: UFW - CTHRUEXS

Pursuant to Sections 0.457(d) and 0.459 of the Commission’s Rules and [FCC Guidance document 726920](#), we hereby request permanent confidentiality treatment of exhibits identified as such in the table below and request they are permanently withheld from public review based on the documents containing trade secrets and proprietary information not customarily released to the public. The public disclosure of this information might be harmful to the applicant and provide unjustified benefits to its competitors.

| Exhibit | Type of Confidentiality Requested | |
|-----------------------|--|-------------------------------------|
| Block Diagrams | <input checked="" type="checkbox"/> Permanent | <input type="checkbox"/> Short Term |
| Internal Photos | <input checked="" type="checkbox"/> Permanent* | <input type="checkbox"/> Short Term |
| Operation Description | <input checked="" type="checkbox"/> Permanent | <input type="checkbox"/> Short Term |
| Schematic Diagrams | <input checked="" type="checkbox"/> Permanent | <input type="checkbox"/> Short Term |

The asterisked items () require further information to be provided in this justification letter before permanent confidentiality will be extended to these exhibits. Please refer to FCC KDB 726920 D01 found at: <https://apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?switch=P&id=41731> and review section II, 3) regarding specific information that must accompany these requests.*

Note: any documents held under the Short-Term confidentiality will automatically become public after the requested time if an appropriate extension request has not been received. Any exhibits (i.e., schematic diagrams) that may have already been requested to have “Permanent” confidentiality as shown above need not be repeated under Short-Term confidentiality request.

The devices pictured in the document “Internal photos.pdf” are sealed and/or potted unit that cannot be opened after manufacturing without risking to destroy the contents and compromising the working. 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 materials 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.



We respect the environment by using only energy produced from renewable sources such as water, sun, wind and the earth's heat, certified by the "guarantees of origin" system of the energy service manager, in accordance with the EC directive 2009/28/EC





IDS GeoRadar s.r.l.
Via A. Righi 6, 6A, 8
56121 Pisa (PI)
Italy
T: +39 050.098.9300
F: +39 050.7912.130
idsgeoradar.com

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 reminding that the unit will not be made available for sale to the general public.

Sincerely,

Signed: 

Date 2024/04/30

Printed name: Alessandro Simi

Title: R&D Director

Company Name: IDS Georadar s.r.l.

