



8 March 2016

Attention: Application Examiner

RE: Request for Confidentiality
Applicant: Paxton Access Ltd
FCC ID: USE323110

To Whom It May Concern:

Permanent Confidentiality

Request is hereby submitted by Paxton Access Ltd to withhold permanently from public review certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept permanently confidential:

- **Schematics**
- **Detailed Block Diagrams**
- **Detailed Operational/Functional Description**
- **Tune up procedure**
- **Parts list**
- **Internal photos**

NOTE: Requires additional justification such as:

(1) Circuit board covered with epoxy. Show photo with and without epoxy.

NOTE: Scanning receiving internal photos are always held permanently confidential.

Short-term Confidentiality [*Complete this section if short-term confidentiality is requested*]

Request is hereby submitted by Paxton Access Ltd to withhold from public review for a period of 45 days from the date of the Grant of Equipment Authorization and prior to marketing, certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept confidential for a period of 45 days from the date of Authorization:

- Test setup photos
- External photos (NOTE: External photos can only be held for short-term confidentiality)

Rationale for request for confidentiality:

Paxton Access Ltd has invested considerable time and materials in research and development to produce the referenced product. [*Permanent confidentiality:* Disclosure of the permanently confidential portions of this application to competitors would not only give them significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by us.] [*Short term confidentiality:* Disclosure of the short-term confidential portions of this

application during the period of importation and/or distribution would reveal key aspects of proprietary technology to competitors and diminish the value of our investment in research and development.]

The fee for confidentiality has been submitted along with the fee for certification. If you have questions or need further information, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'kfeeney', written in a cursive style.

Kevin Feeney
Conformance Engineer
Paxton Access Ltd