

16 November 2025

Federal Communications Commission
Equipment Authorisation Branch
7435 Oakland Mills Road
Columbia, MD21046
United States of America

Subject: Confidentiality Request for Exhibits under FCC ID: 2AC20-CHU200TLRC

To Whom It May Concern:

Pursuant of Section 0.457 and 0.459 of the Commission's Rules and KDB 726920 D01 Confidentiality Request Procedures, we hereby request that the exhibits listed below, submitted in support of the certification application for FCC ID: 2AC20-CHU200TLRC, be withheld permanently from public disclosure:

- Schematics
- Block Diagram
- Operational Description
- Internal Photographs

The above exhibits, owned solely by Windcave Limited, contain trade secrets and proprietary information which is not routinely available to the public or to our competitors. The public disclosure of these materials may be harmful to the applicant and provide unjustified benefits to its competitors.

This device is a PCI PTS approved secure PIN entry terminal. It is permanently disabled and made inoperable if the cover is removed due to active tamper detection circuitry. None of the circuit boards or internal components are accessible without permanently disabling the device which requires the device to be returned to the manufacturer as per PCI requirements. Additionally, components are covered with conformal coating where practical.



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The photos of the circuit boards however display secret information regarding the location of tamper detection circuits which could be used to circumvent them and gain access to the internals of the product without triggering a tamper, and then the device can be bugged in order to steal a user's banking information. For these reasons we do need the internal photos to be restricted.

Confidentiality of the internal photographs is specifically sought because the device could be re-engineered from the photographs.

Windcave controls information about and access to the device as follows:

- The schematics, internal photographs and the like are only used internally by Windcave or by those 3rd parties as are required to complete product testing.
- User manuals do not include schematics, internal photographs, detailed descriptions of device operation or detailed block diagrams.
- To meet strict Payment Card Industry (www.pcisecuritystandards.org) security requirements, the devices include security mechanisms which disable the device if it is opened and prevent the modification of the firmware by the user.
- The PCI Security Standards require that all devices are returned to Windcave Ltd. at their end of life. Therefore Section 7.6 of the Windcave Customer Contract states:
"Consequences of termination: On the termination of this Agreement, you must immediately:
a) return all Windcave Limited Products to Windcave Limited..."

The applicant understands that pursuant to Section 0.457 of the Rules, disclosure of this application and all accompanying documentation will not be made before the date of the Grant for this application.

Yours sincerely

A handwritten signature in black ink that reads "C Collard".

Cameron Collard

Global Head of Compliance Risk & PMO

Windcave Limited