Zhuhai Pantum Electronics Co., Ltd.

Attention: Certification reviewer

RE: Request for Confidentiality
FCC ID: 2AEGO2013SB15

To Whom It May Concern:

☒ ***Permanent Confidentiality*** [*Complete this section if permanent confidentiality is requested*]

Request 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:

[*Select one or more of items below, as appropriate*]

- ☒ **Schematics**
- ☒ **Block Diagrams**
- ☒ **Operational Description**
- ☐ **Tune-up Procedure**
- ☐ **Parts List**
- ☐ **Internal Photos** (see note)
- ☐ **Users Manual** (see note)

Note 1: Internal Photos may be held confidential 1) if the circuit board or internal components are not accessible to users. For example, it is acceptable if the circuit board is enclosed in epoxy. 2) Also, it is acceptable if the device is not accessible to the public, for example, a device mounted on the top of a large tower (or in a fenced enclosure) such that it is only serviceable by professional designated technicians under a Non-Disclosure Agreement (NDA). All sales for these devices must be under a NDA restricting the disclosure of the propriety information, including internal photos.
Users Manual may be held confidential only when the manual contains proprietary technical information intended for professional technicians obligated under a NDA. All sales and distribution of the user's manual must be under a NDA that restricts the disclosure of the information.
In the application cover letter requesting permanent confidentiality the following additional description and the NDA exhibit is required:

1. Describe in detail how internal photos and/or users manual information are controlled to prevent them from becoming public or disclosed to unauthorized persons.
2. Describe how public access is restricted for products serviceable by professional designated technicians.
3. A statement that all sales of the non-consumer device will be under a NDA to include third party sales and that the final user of the device is subject to the NDA.
4. Provide an example of the NDA between the grantee and a purchaser. The request for confidentiality must

Note 2: For scanning receiver, the schematics, block diagrams, operational description, tune-up procedure, parts list and internal photos are <u>always</u> held permanently confidential.

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

Request to withhold from public review for a period of [please enter 1 to 180] 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 short-term confidential for a period above from the date of the grant

[*Select one or more of items below that are **not** selected in the list above, as appropriate*]

- ☐ **Schematics**
- ☐ **Block diagrams**
- ☐ **Operational Description**
- ☐ **Tune-up Procedure**

☐ **Parts List**
☐ **Test Setup Photos**
☐ **External Photos**
☐ **Internal Photos**
☐ **Users Manual**

Rationale for request for confidentiality:

We have 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.

If you have questions or need further information, please contact the undersigned.

Sincerely,

Emma Li
_____
[Emma Li]
[Department manager]
[2023-01-11]