



Re: Confidentiality of internal photos, UWB applications AN17T0624 and AN17T0539, FCC-id's 2ALZQ-CO1760 and 2ALZQ-CO4080

Dear Sirs,

For many years, it has been common practice for GPR-manufacturers to apply for, and be granted, long term confidentiality for the internal photos of their products. The rationales for these grants have been outlined in our request for confidentiality, and does not need to be re-stated here.

FCC now asks whether our products are sold under NDA agreements and for further explanations on how we protect the interior of our products from being revealed to outsiders.

We are somewhat confused by these additional requests and ask if there has been some recent change in the rules governing grants for confidentiality? A quick search on the FCC-site reveals that as late as september 2017, a company was granted confidentiality for their internal photos, on nearly identical argumentation as we are submitting. See figure 1. The Application we refer to was filed by Malå GeoScience and have the FCC-id: QLAWIDERANGE, FNR: 0007547938.

OET Exhibits List

13 Matches found for FCC ID QLAWIDERANGE

View Attachment	Exhibit Type	Date Submitted to FCC	Display Type	Date Available
FCC Contact Info	Cover Letter(s)	09/21/2017	pdf	09/27/2017
Confidentiality	Cover Letter(s)	09/21/2017	pdf	09/27/2017
Secret Audio	Cover Letter(s)	09/21/2017	pdf	09/27/2017
Correspondence	Cover Letter(s)	09/21/2017	pdf	09/27/2017
External Photos	External Photos	09/21/2017	pdf	09/27/2017
Label and Location	ID Label/Location Info	09/21/2017	pdf	09/27/2017
Test Report	Test Report	09/27/2017	pdf	09/27/2017
Test Report	Test Report	09/27/2017	pdf	09/27/2017
Test Report	Test Report	09/27/2017	pdf	09/27/2017
Test Report	Test Report	09/27/2017	pdf	09/27/2017
Test Report	Test Report	09/27/2017	pdf	09/27/2017
Test Setup Photos	Test Setup Photos	09/21/2017	pdf	09/27/2017
User Manual	User Manual	09/21/2017	pdf	09/27/2017

Figure 1, Application filed by Mala GeoScience AB, Sweden, granted confidentiality for internal photos

If the rules have changed recently, we must of course adhere to these changes, but if not, and since reverse-engineering is readily doable from the close-up picture of electronics shown in the internal photos, we'd ask for equal treatment with regards to this type of exhibits. In short; if we must reveal our designs to our competitors, we'd like to be able to see theirs as well.

Now to the specific requests on NDA and how we protect our products:

- We do not sell our products under NDA-agreement.
- We take a number of measures to discourage people from opening our products. The most important ones are shown in photos from our assembly-line, on the following pages.

We hope that this further information will be sufficient for grant of confidentiality on our internal photos.

Best Regards

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