1999 S Bascom Ave,
Campbell, CA 95008

Federal Communications Commission
7435 Oakland Mills Road
Columbia MD 21046

Date: October 9, 2018
Subject: Request for Confidentiality
FCC ID: 2AQ98-UNO

To Whom It May Concern:

Pursuant to Sections 0.457 and 0.459 of the Commission's rules (47 C.F.R. §§ 0.457, 0.459), Culvert IoT Corporation requests that the Commission indefinitely withhold from public disclosure the following attachments associated with the certification application for the above-referenced FCC ID: 2AQ98-UNO:

- Theory of Operation (Operational and Technical Description)
- Block Diagram
- Schematic Diagram

In support of this request, Culvert provides the following information:

1. **Identification of the specific information for which confidential treatment is sought (§ 0.459(b)(1)):** Culvert requests that all of the information contained in the above-referenced exhibits to the certification application be withheld from routine public disclosure.

2. **Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission (§ 0.459(b)(2)):** The material is being submitted in connection with Culvert's certification application for FCC ID 2AQ98-UNO.

1999 S Bascom Ave,
Campbell, CA 95008

3. **Explanation of the degree to which the information is commercial, or financial or contains a trade secret or is privileged (§ 0.459(b)(3)):** The market for the technology that is the subject of the certification application is highly competitive, with numerous companies competing for the business of potential customers. Were Culvert's competitors to become aware of the facts set forth in the above-referenced exhibits to the application at this time, it could have an adverse impact on Culvert's competitive standing and deprive Culvert of the marketplace benefit it otherwise might achieve by virtue of having the product available before other competitors. If any of the information for which confidential treatment is sought were to be made publicly available, Culvert's competitors could reasonably determine the scope and status of our activities.

4. **Explanation of the degree to which the information concerns a service that is competitive (§ 0.459(b)(4)):** The technology that is the subject of the certification application is subject to intense competition from other manufacturers and service providers that are developing competing services and technology.

5. **Explanation of how disclosure of the information could result in substantial competitive harm (§ 0.459(b)(5)):** As noted above, were Culvert's competitors to become aware of the facts set forth in the above-referenced exhibits to the application, it could have an adverse impact on Culvert's competitive standing and deprive Culvert of the marketplace benefit it otherwise would achieve by virtue of having the product available before other providers.

6. **Identification of any measures taken by the requesting party to prevent unauthorized disclosure (§ 0.459(b)(6)):** The information contained in the above-referenced exhibits to the certification application has been strictly controlled by Culvert, with distribution limited to internal use only and for the specific purpose of conducting research, development, and testing of the technology.

7. **Identification of whether the information is available to the public and the extent of any previous disclosures of the information to any third parties (§ 0.459(b)(7)):** The information that Culvert requests be maintained as confidential is not available publicly. The information has been protected and kept confidential by limiting external contacts to privileged and confidential communications.

8. **Justification of the period during which the submitting party asserts that material should not be available for public disclosure (§ 0.459(b)(8)):** Given the competitive nature of the marketplace, any disclosure that Culvert has developed the technology discussed in the above-reference exhibits to the certification application would harm Culvert's competitive position. The information subject to this request for confidentiality should not be made available for public disclosure at any time.

In addition, pursuant to Public Notice DA 04-1705, and in order to comply with the marketing regulations in 47 C.F.R. §2.803 and the importation rules in 47 C.F.R. §2.1204 while ensuring

1999 S Bascom Ave,
Campbell, CA 95008

that business-sensitive information remains confidential until the actual marketing of newly authorized devices, Culvert also requests that the Commission grant temporary confidential treatment and not release the following attachments for routine public disclosure until 180 days following the grant of this certification application:

- Internal Photos
- External Photos
- Test Setup Photos
- User Manual

It is our understanding that test measurement reports and correspondence during the certification review process cannot be granted confidential treatment, and such information will be available for public review once the grant of equipment authorization is issued.

Sincerely Yours,

Name: Prasad Panchalan
Title: CEO
Company name: Culvert IOT Corporation
Address: 1999 S Bascom Ave, # 230
Campbell, CA 95008
Phone: +1 408-505-8660
Email: prasad@culvertengineering.com