

September 17, 2019

Sporton International Inc.
EMC & Wireless Communications Laboratory
No.52, Huaya 1st Rd.
Guishan Dist., Taoyuan City
Taiwan, R.O.C.

Subject: Confidentiality Request regarding the

FCC ID: 2AT6813002019 **Product:** CBRSYS1300-WTE-2S

Dear Madam, Dear Sir;

Celliber Technologies Private Limited (Celliber) hereby officially requests that the following items and information be kept confidential and **be permanently withheld from public review** in connection with the above-referenced application. The present request is made under Sections 0.457(d) and 0.459 of the Federal Communications Commission (FCC) Rules (CFR Title 47):

1. Block Diagram
2. Schematics/Wiring Diagram
3. Operational Description / Software Security for U-NII Devices
4. All Internal Photographs
5. User's manual/Datasheet

Though Celliber believes that the **above items and information** (collectively, the "**Items**") are in fact trade secrets, which by definition are not for public inspection, to be on the cautious side, Celliber requests that these **Items** be permanently restricted from public inspection and review as their public disclosure could, and would, cause irreparable competitive harm to Celliber.

In support of our request, Celliber submits the following:

- a) The **Items** contain information that is both highly confidential and proprietary technical information concerning Celliber's CBRSYS1300-WTE-2S product design and operating characteristics. Consequently, Celliber respectfully requests that the **Items** be treated as such, i.e. confidential information to be withheld from public inspection and review.
- b) Disclosure to Celliber's competitors of technical information contained in the above list of **Items** would likely compromise Celliber's ability to sell and continue to develop similar products as such competitors could reverse engineer the technical information contained therein.
- c) In releasing technical information concerning our products, including the **Items**, competitors could most certainly gain access and insight in Celliber's confidential and proprietary information, which would afford them the potential to develop and manufacture the CBRSYS1300-WTE-2S products and provide them with an unfair advantage.
- d) As mentioned in the preamble of our justifications for our request, disclosure of the



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Items and the technical information relating thereto would cause permanent irreparable competitive harm to Celliber, as such disclosure would also provide competitors with knowledge and insight into Celliber's proprietary and confidential product development process and therefore potentially open the door for them to reverse engineer and afford them an unfair advantage by creating access to technology developed by Celliber over years of work and significant financial investment.

- e) Celliber takes great efforts to ensure that its technology, business and other proprietary information remain protected at all times. Celliber's confidential information is never disclosed to the public. Every client, manufacturer, representative, business partner or employee of Celliber must sign a non-disclosure agreement ("**NDA**"). For greater certainty, no **Item** may be sold without the prior execution of an NDA by its purchaser.
- f) Under the terms of the NDA, only authorized individuals may use confidential information. Consequently, the **Items** are not to be made accessible to the general public.
- g) As stated above, Celliber's proprietary and confidential information, including but not limited to the **Items**, is not, and has not been, disclosed to the public.
- h) As the products forming part of the **Items** are meant to be used for many years to come, it is Celliber's belief that such information should be withheld permanently from public review and inspection and request to do so is hereby respectfully submitted.

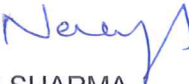
As already first mentioned, we believe that the **Items** and the information in connection therewith are more than something Celliber would like to remain confidential: they are trade secrets which are not for public consumption. These products were developed over years and significant investments have been made, including the risks and gamble that always go hand-in-hand with the development of new technology. Celliber hereby therefore makes this request for a long term so to prevent i) the release of its trade secrets to competitors and ii) the creation of an unfair advantage in their favour resulting in substantial competitive harm to Celliber.

Based on the foregoing reasons, Celliber hereby respectfully requests that the FCC grant Celliber's request to permanently treat the **Items** and information in connection therewith as confidential information, and withhold same from public review and inspection.

Should the FCC need more information, please contact the undersigned at neeraj.sharma@celliber.com or at phone +91-80-49518840.

Yours truly,

CELLIBER TECHNOLOGIES PVT LTD.

By : 
NEERAJ SHARMA,

Director Hardware Engineering & Production



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