



Schindler

Schindler Elevator Corporation
SIS Digital Services

Schindler Elevator Corporation
20 Whippany Road Morristown, NJ 07960-4539, United States

Federal Communications Commission (FCC)
Office of Engineering and Technology

From Christopher Mason, Director IoEE
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Email christopher.mason@schindler.com
Date August 5, 2022
Subject **Confidentiality Request for FCC ID: 2AVFL-50701019**

Office of Engineering and Technology,

Pursuant to sections 0.457, 0.459 of CFR 47, the applicant (Schindler Elevator Corporation) requests that materials/exhibits provided in conjunction with our application, supporting documentation, transmittals, correspondence receive and be handled with the following confidentiality.

<u>Item(s):</u>	<u>Requested Confidentiality Level:</u>
Block Diagrams	Long-Term/Permanent Confidentiality
External Photos	Short-Term Confidentiality
Internal Photos	Long-Term/Permanent Confidentiality
Operational Description	Long-Term/Permanent Confidentiality
Theory of Operation(s)	Long-Term/Permanent Confidentiality
Parts List, Placement, BOM	Long-Term/Permanent Confidentiality
Schematics	Long-Term/Permanent Confidentiality
Test Setup Photos	Short-Term/Permanent Confidentiality
User's Manual	Long-Term/Permanent Confidentiality

For all Long-term/Permanent Confidentiality requested items our request is justified in the nature of the operational use and security considerations as follows:

Schindler has spent substantial effort in developing this product and it is one of the first of its kind in industry. Having the subject information easily available to "competition" would negate the advantage they have achieved by developing this product. Not protecting the details of the design will result in financial hardship.

The device(s) included in this application are in direct connection(s) to sensitive/secure building equipment. The devices have access to sensitive information about building operations, communications and human movement. As such exposure of confidential information included in the list above could create/result in a security hazard to Schindler Elevator Corporation, Schindler's customers (building owner's), and passengers/riders of Schindler manufactured equipment/Technologies. Security hazards can

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include (but not limited to): Prevention of emergency services, hazardous movements resulting in injury or death, entrapments, and telecommunications hazards/interference.

For items requested with confidentiality of "Short-Term", it's Schindler's position that exposure of said information would jeopardize Schindler's technical advantage, or market abilities and would cause financial harm to Schindler. Our request for short-term confidentiality will allow Schindler to receive a Return On Investment (ROI) for technologies that Schindler has custom developed and is the leader in the industry at this time. Undue exposure would prevent Schindler from marketing our technologies under the Schindler brand in a fair manner.

Permanent Confidentiality:

The applicant requests the exhibits listed above as permanently confidential be permanently withheld from public review due to materials that contain trade secrets and proprietary information not customarily released to the public.

Short-Term Confidentiality:

The applicant requests the exhibits selected above as short term confidential be withheld from public view for a period of 180 days from the date of the Grant of Equipment Authorization and prior to marketing. This is to avoid premature release of sensitive information prior to marketing or release of the product to the public. Applicant is also aware that they are responsible to notify TUV Rheinland in the event information regarding the product or the product is made available to the public. TUV Rheinland will then release the documents listed above for public disclosure pursuant to FCC Public Notice DA 04-1705.

Regards
Schindler Elevator Corporation
20 Whippany Road
Morristown NJ, 07960
Mr. Christopher Mason
Director IoEE

Signature: _____