



**Federal Communications Commission
Equipment Authorization Division
7435 Oakland Mills Road
Columbia, MD 21048**

Date: September 5, 2023

Subject: Request for **Permanent Confidentiality**

FCC ID: 2AXA8-PGW-2003

To Whom It May Concern:

In accordance with §0.457(d) and §0.459 of CFR 47, and KDB 726920, **Trackonomy Systems, Inc.** hereby requests permanent confidentiality for documents filed under the following exhibit types:

1. Block Diagram
2. Schematics
3. Internal Photos
4. Parts List/Tune Up Procedure
5. User Manual
6. SDR Software / Security Info
7. Operational Description

These items contain detailed system and equipment description and related information about the product which **Trackonomy Systems, Inc.** considers to be proprietary, confidential and a custom design which otherwise would not be released to the general public. Since this design is a basis from which future technological products will evolve, **Trackonomy Systems, Inc.** also feels that this information would be of benefit to its competitors, and that the disclosure of the information in these exhibits would give our competitors an unfair advantage in the market.

We are aware that exhibit types *cover letters, attestations, label document, test reports, RF exposure information (SAR and MPE reports)*, cannot be requested to be classified confidential and are thus subject to publication, as will be documents of all other exhibit types for which we have not requested a confidentiality classification.

Best Regards,

Signature

Dr. Saurabh Sanghai
Director of Engineering
Trackonomy Systems, Inc.
214 Devcon Drive, San Jose, CA 95116



To whom it may concern,

We, Trackonomy Systems, Inc. request Long-Term Confidentiality for “internal photos” and “user manual” for FCC application of our product PGW-2003. Below are the detail justifications:

1. The ‘user manual’ and ‘internal photos’ of the product contain highly confidential and proprietary information.
2. The PGW-2003 product is not user serviceable and can only be installed and serviced by authorized and trained professionals and users are not allowed to disassemble the product. Trackonomy offers support services for the entire life cycle of the product including service to requirements for decommissioning and sunsetting to keep essential infrastructure working smoothly using this product.
3. All sales for these devices must be under an NDA restricting the disclosure of the propriety information, including internal photos and user manual.
4. User manual contains proprietary technical information intended for professional technicians obligated under an NDA.
5. All sales of the non-consumer device will be under an NDA to include third party sales and that the final user of the device is subject to the NDA.
6. The PGW-2003 product and its subassemblies are integrated using Trackonomy proprietary integration process.
7. All points mentioned above in our support letter document allow for the provision of claiming long term confidentiality based on FCC KDB number 726920. Based on this we qualify and are requesting for long term confidentiality.

A handwritten signature in black ink, appearing to read "Saurabh Sanghai", with a stylized flourish at the end.

Dr. Saurabh Sanghai
Director of Engineering

Date: 9/7/2023