



FCC ID: 2AZKT710-99000W

Date: July 21, 2021

Federal Communications Commission
Office of Engineering and Technology Laboratory Division
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Request for Confidentiality

Ref: Telematics (FCC ID: 2AZKT710-99000W)

To whom it may concern:

Pursuant to the provisions of 0.457 and 0.459 of the Commission's rules (47 C.F.R. §§ 0.457, 0.459), Waymo LLC hereby requests confidential treatment for documents filed with the Commission in connection with the application for equipment authorization referenced above.

Permanent Confidentiality

Waymo requests that the Commission withholds the following documents from public viewing indefinitely:

- Block diagrams
- Electrical schematic diagrams
- Operational descriptions
- Internal photographs
- Antenna specifications
- User manual

These documents reveal technical and design information that is protected by Waymo as confidential and proprietary trade secrets. This information has only been disclosed to those required to maintain its confidentiality and is not disclosed to the public even after commercial release of a device.

The device being authorized is not sold to third parties and is not accessible to the general public. The device cannot be serviced except by the manufacturer and its authorized vendors. The device is installed in fleet vehicles in areas inaccessible to individuals riding in the vehicles, is sealed, and cannot be accessed other than by Waymo personnel or its authorized agents. Waymo employees and authorized agents with access to the device are subject to confidentiality obligations, including execution of confidentiality agreements.

The technical and design information found in these documents and photographs represent commercially valuable innovations that were obtained by Waymo through substantial efforts and financial cost. As a result, disclosure of this information by the Commission would harm Waymo by giving competitors an unfair advantage.

Short Term Confidentiality

In addition to the above mentioned documents, and to ensure that business sensitive information remains confidential until the actual marketing of newly authorized devices, Waymo requests that the Commission



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withhold the following documents from public viewing for 180 days after the date the grant of authorization is issued:

- External photographs
- Test setup photographs

These documents reveal technical and design information that has not been publicly disclosed in marketing materials and is protected by Waymo as confidential and proprietary trade secrets. This information has only been disclosed to those required to maintain its confidentiality and is not disclosed prior to the commercial release of the device. As a result, disclosure of this information by the Commission prior to commercial release would harm Waymo by giving competitors an unfair market advantage because some of the external-facing components are purpose built for Waymo. Waymo believes the period of confidentiality requested is necessary to protect the information until the commercial release of the device.

It is our understanding that measurement test reports and FCC ID label format cannot be granted as confidential documents and this information will be available for public review once the grant of equipment authorization is issued.

Sincerely,

Name: Ajay Gummalla

Title: Self-driving Systems Engineering Lead

Company name: Waymo LLC