

Request for Confidentiality

Date: February 15, 2023

Subject: Confidentiality Request for:

FCC ID: IPH-04560

ISED ID: 1792A-04560

Pursuant to FCC 47 CFR 0.457(d) and 0.459 and IC RSP-100, Section 9.4, the applicant requests that a part of the subject FCC application be held confidential.

Type of Confidentiality Requested			Exhibit
☐ Short Term	☒ Permanent	☐ Not Provided	Block Diagrams
☒ Short Term	☐ Permanent	☐ Not Provided	External Photos
☒ Short Term	☐ Permanent	☐ Not Provided	Internal Photos
☐ Short Term	☒ Permanent	☐ Not Provided	Operation Description/Theory of Operation
☐ Short Term	☒ Permanent	☐ Not Provided	Tune-Up Procedure
☐ Short Term	☒ Permanent	☐ Not Provided	Schematics
☒ Short Term	☐ Permanent	☐ Not Provided	Test Setup Photos
☒ Short Term	☐ Permanent	☐ Not Provided	User's Manual

Garmin 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. Disclosure would also offer competitors additional unwarranted insight into the state of the product development, thereby allowing competitors an advantage, not available to Garmin International, Inc.

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 TIMCO in the event information regarding the product or the product is made available to the public before the requested period has expired. TIMCO will then release the documents listed above for public disclosure pursuant to FCC Public Notice DA 04- 1705.

This material should not be disclosed for at least 25 years. While improvements in design are made relatively frequently, disclosure of the design information would lead to insights into both design and manufacturing techniques that could have an adverse competitive effect for many years to come. As such, it is important that the design not be made available to unauthorized persons who might attempt to use knowledge of the design to compromise the applications for which the equipment will be employed.

Should you require any further information, please contact the undersigned. Thank you for your consideration in this matter.

Sincerely,



Michael Moranha
Lead Compliance Engineer