

6/30/2020

Attention: Application Examiner

RE: Request for Confidentiality
Applicant: Spectrum Brands, Inc.
FCC ID: NUL450126VHC

To Whom It May Concern:

Request is hereby submitted by Spectrum Brands, Inc. to withhold permanently from public review certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept permanently confidential:

- **Schematics**
- **Detailed Block Diagrams**
- **Detailed Operational/Functional Description**

Short-term Confidentiality *[Complete this section if short-term confidentiality is requested]*

Request is hereby submitted by Spectrum Brands, Inc. to withhold from public review for a period of 180 days from the date of the Grant of Equipment Authorization and prior to marketing, certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept confidential for a period of 180 days from the date of Authorization:

- Internal photos
- User manual

Rationale for request for confidentiality:

Spectrum Brands, Inc. has invested considerable time and materials in research and development to produce the referenced product. [*Permanent confidentiality*: Disclosure of the permanently confidential portions of this application to competitors would not only give them significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by us.] [*Short term confidentiality*: Disclosure of the short-term confidential portions of this application during the period of importation and/or distribution would reveal key aspects of proprietary technology to competitors and diminish the value of our investment in research and development.]

Sincerely,



Thuan Nguyen
Sr. Electrical Engineer
Spectrum Brands, Inc.