



KEYCORP

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November 19, 2001

FEDERAL COMMUNICATIONS COMMISSION

7435 Oakland Mills Road

Columbia, MD 21046

U.S.A.

Subject: Request for withholding from public disclosure the schematic diagrams and system block diagrams pursuant to an application for certification.

Applicant: Keycorp Limited
Product: Mobile Payment Terminal
Models: K78-202 and K78-204 or LP9100
FCC ID: P3AK78-2XX

Dear Sir/Madam,

We, **Keycorp Limited**, would like to request that the **schematic diagrams and system block diagrams**, submitted with the application for certification be withheld from public disclosure as per Section 0.459 of FCC Rules. This request is made under the provisions of Section 0.457(d) of the Commission's Rules, and Section 552(b)(4) of the Freedom of Information Act. These sections authorize as a withholding from public inspection materials which would be privileged as a matter of law if retained by the person submitting them, and materials which would not customarily be released to the public by that person.

Yours truly,

Ken McAnulty

International Regulatory Compliance Manager