



REQUEST FOR CONFIDENTIALITY

IDS GeoRadar

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Equipment Authorization Division
Federal Communications Commission
7435 Oakland Mills Road
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FCC ID: UFW-ROCKSPOT
Product Name: ROCKSPOT

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

Type of Confidentiality Requested	Exhibit
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent
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(*) According to FCC guide "726920 D01 Confidentiality Request Procedures v01r02" (April 8, 2016), we wish that all contents shown in the "internal photos" exhibit are subject to this Long Term Confidentiality request.

Note: these materials contain trade secrets and proprietary information and are not customarily released to the public. The public disclosure of this information might be harmful to the company and provide unjustified benefits to our competitors.

The devices pictured in the document "ROCKSPOT-Internal photos.pdf" are sealed and potted unit that cannot be opened after manufacturing without destroying the contents.

Specifically, in order to view inside the product to which this request refers, one would have to carry out the following steps:

1. Use a special key to remove the screws securing the cover. This special key is not available to the general public. Moreover, these screws have to be removed in a specific order not to cause irreparable damages. The information on the removal order is available to IDS GeoRadar and to authorized repair centers only.
2. Inside the unit, electromagnetic absorbers cannot be removed without damage and will have to be replaced with new ones when re-assembling. This material is custom built and not available to the public or to a competitor.
3. De-solder the transmitter and the receiver from the antenna flares to initiate access to certain electronics of the antenna. Then carefully disconnect and withdraw the assemblies from the shield /construct assembly. When these steps are done improperly the electronics can be severely damaged.

IDS GeoRadar has never released instructions on how to disassemble its units and does not answer questions on how to do so. This information is kept internal to the company. If a unit arrives at the company's repair facility

showing evidence of such tampering, the company does not repair it, but charges the customer for a new unit plus freight costs.

The Commission's posting of the photographs as well as of the schematics and components list, would allow a competitor to bypass this difficult and expensive disassembly. From the photographs, a competitor can also estimate:

1. the costs of manufacturing the printed circuit boards and mechanical housing;
2. the man-hours required to assemble the device;
3. any compatibility problems the manufacturer will have in designing new systems; and
4. the age of the electronic design (which gives valuable competitive information on upgrade and R&D efforts).

Access to interior photographs would almost permit a competitor to conduct a complete reverse engineering, to the point of producing a schematic.

We are also reminding that the unit will not be made available for sale to the general public.

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.

Dated this 16th Day of June 2020

By:



Guido Manacorda

Title: Director R&D

On behalf of : (Company Name) IDS GeoRadar srl

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