

**Cubic Transportation Systems Limited**

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26-OCTOBER-2020

Attention: Application Examiner

RE: Request for Confidentiality  
Applicant: Cubic Transportation Systems Ltd.  
FCC ID: LVCTR4

To Whom It May Concern:

***Permanent Confidentiality***

Request is hereby submitted by Cubic Transportation Systems Ltd. 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**
- **Internal photos:**
  - Non-consumer device secured in its location that is only serviceable by the licensee or designated technicians.
  - All internal photos show components and design decisions that are proprietary to Cubic Transportation Systems
  - Customers are under NDAs not to disclose confidential information

Rationale for request for confidentiality:

Cubic Transportation Systems Ltd. has invested considerable time and materials in research and development to produce the referenced product. 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significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by us.

With respect to the request that internal photos remain permanently confidentiality the following additional rationale is given. The product is not sold to end users. It is primarily

sold to transit agencies for the purpose of fare payment collection. The device is not end user serviceable and will only be repaired/serviced by trained technicians. The general public cannot access any part of the product; their sole point of interaction is through contactless media. In addition to this, a secure Payment Card Industry (PCI) certified module developed by Cubic Transportation Systems Ltd is contained within the product, disclosure of images of this could comprise the security of the device.

To service or repair the product the customer (transit agencies) use trained service personal to remove the product and send it back to a workshop where other trained technicians service/repair the unit.

If you have questions or need further information, please contact the undersigned.

Sincerely,



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Tom Vilhelmsen  
Engineering Fellow