



Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046
United States of America

Invenco Group Limited
PO Box 68281
Newton
Auckland 1145
New Zealand
www.invenco.com

July 17 2017

Re: FCC Inquiry Tracking Number 494072

Dear Sir or Madam,

We have submitted the inquiry number 494072 requesting that the status of user/installation manuals for our outdoor payment terminal products be changed to long term confidential.

We are aware the user manuals for the products listed below are currently public via the FCC website.

- FCC ID: 2AC7B-G7UPC
- FCC ID: 2AC7B-G6OPT
- FCC ID: 2AC7B-G60PB

Under 726920 D01 Confidentiality Request Procedures v01r02 II. LONG-TERM CONFIDENTIALITY 3) b) and IV. EXCEPTIONAL CIRCUMSTANCES 2) I request that status of the user manuals listed above are changed from public to Long Term Confidential.

The manuals contain proprietary technical information intended for professional installation technicians obligated under a NDA. All sales, including third party sales, and sale to the final user, and distribution of the product including the user's manual are under a NDA that restricts the disclosure of the information. Attached is a sample of the NDA used for product sales.

Printed user manuals are not issued with the physical package, nor are they available on the Invenco company website for download. Distribution of the user manual is controlled by following NDA term:

Section 4.2 of the NDA states: *The Recipient will ensure that its Agents are aware of the confidentiality of the Information, the existence and terms of this Agreement and consider themselves bound by the provisions of this Agreement as if they were parties to this Agreement. The Recipient will take all such reasonable steps as are necessary to prevent any unauthorised use or disclosure of such Information by any of its Agents.*



Every organization must sign an NDA to ensure that every member of their organization is restricted from using the document outside of the listed terms of the confidential and proprietary document. Only authorized service technicians and organizations are permitted to use our confidential user/installation manuals documents.

Before sending confidential documents to individuals, those documents are encrypted, using public key cryptography, and that individual's public key. Only that person can decrypt the document with their private key. Additional security passwords and signatures may be added as required to each PDF document to further secure the proprietary information.

The security and compliance of the Invenco G7 UPC product is compromised by the disclosure of the user/installation manuals to unauthorized persons. The disclosure of this information intentional or unintentional is deemed a liability by the financial institutions (i.e., AMEX, VISA, MasterCard, Discover & JCB) responsible for advancing and promoting the Payment Card Industry Data Security Standards. There is also the consideration of disclosing Invenco's intellectual property to competitors.

A handwritten signature in blue ink, appearing to read "Dave Ritten", with a long horizontal stroke extending to the right.

Dave Ritten
Director
Invenco Group Limited

FRN: 0023931611

Grantee Code: 2AC7B

