



4011 GARROTT STREET
HOUSTON, TEXAS 77006

OFFICE: +1 (832) 930-2148
INFO@SKYLARKWIRELESS.COM

July 21, 2023

Federal Communications Commission
Office of Engineering and Technology Laboratory Division
7435 Oakland Mills Road
Columbia, MD 21046

RE: Request for Confidentiality for FCC ID: 2AS22-LUMACH2 Class II Permissive Change

To whom it may concern,

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's Rules (CFR 47), Skylark Wireless, LLC hereby requests **Long-Term Confidentiality treatment of the following attachments by the Commission:**

- Block Diagram
- Operational Description & Tune-up Procedure
- Internal Photos
- User Manual

The above-mentioned documents contain detailed system and equipment descriptions and are considered as proprietary information not customarily released to the public. The public disclosure of these matters might be harmful to the Applicant and provide unjustified benefits to its competitors.

Regarding the Long-Term Confidentiality request for the User Manual, Skylark attests that all sales of the non-consumer device will be under NDA, including third party sales, and that the final user of the device will be subject to the NDA as required by the special conditions of KDB 726290 D01 Section II(3)(c). Furthermore, as required by Section II(3)(c)(4) of the KDB, a sample of the NDA between the grantee and the purchaser has been included in this filing.

Regarding the Long-Term Confidentiality request for the Internal Photos, the following points illustrate how the product satisfies the conditions outlined in KDB 726290 D01 Sections II(3)(a) and II(3)(c)(2):

- II(3)(a)(1): The circuit board and internal components are not accessible to users due to the use of non-standard screws on the host enclosure.
- II(3)(a)(2): The device is not accessible to the public as it is only intended to be mounted on large towers, many of which will likely be in a fenced enclosure. Therefore, the device will only be serviceable by professional designated technicians, all of whom will be under NDA with the grantee to restrict the disclosure of proprietary information, including internal photos.



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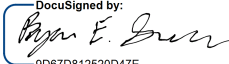
- II(3)(c)(2): As outlined above, both the nonstandard screws as well as the deployment locations of the product will serve to restrict public access to the products, which are only serviceable by professional designated technicians. This is especially true given the device's classification as a Class B CBSD, which requires installation to be performed only by Certified Professional Installers.

Additionally, pursuant to Public Notice DA 04-1705 of the Commission's Policy, we hereby request a **180-day period of Short-Term Confidentiality for the following attachments:**

- External Photos
- Test Setup Photos

The short-term confidentiality period will give Skylark Wireless, LLC temporary confidentiality of commercially sensitive information prior to product release

Sincerely,

DocuSigned by:

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Ryan E. Guerra
Skylark Wireless LLC
CEO