

Cubic Transportation Systems Limited
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09-OCT-2019

Attention: Application Examiner

RE: Request for Confidentiality
Applicant: Cubic Transportation Systems Ltd.
FCC ID: LVCVAL2 LTE02

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**
- **Operation Manual / Detailed Operational / Functional Description**
- **Internal photos**
- **Maintenance Manual**

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significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by us.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. A key lock on

the mount of the fixtures this is attached to insures that the general public cannot access its internal components. 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.

As the product is not sold to end users the user manuals are also requested to be held permanently confidential. The product is locked in place and cannot be removed from its fixed location without a key which is held only by trained professionals. To service the unit this key will be required and without it the unit does not have any accessible parts to service. 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 to trained technicians to service/repair.

Short-term Confidentiality

Request is hereby submitted by **Cubic Transportation Systems Ltd.** to withhold from public review for a period of 180 days from the date of the Grant of Equipment Authorization and prior to marketing, 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 confidential for a period of 180 days from the date of Authorization:

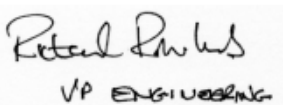
- External photos And Test Setup Photos

Rationale for request for confidentiality:

Disclosure of the short-term confidential portions of this application during the period of importation and/or distribution would reveal key aspects of proprietary technology to competitors and diminish the value of our investment in research and development.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Rowlands", with "VP ENGINEERING" written in smaller capital letters below it.

Richard Rowlands
VP Of Engineering