

Request for Permanent & Short-Term Confidentiality

April 7, 2020
MSBD-20-F001

UL Japan, Inc.
Consumer Technology Division
4383-326 Asama-cho, Ise-shi
Mie, 516-0021, Japan

Subject: Class II Permissive Change Application for Panasonic RFID Module,
Model RI16A under FCC ID: ACJ9TGRI16A / Certified Under FCC Parts 15C
For Installation within Panasonic Personal Computer Model CF-33

To whom it may concern:

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's rules (47 CFR §§ 0.457, 0.459), we are requesting the Commission to withhold the following attachments as **permanent** confidential document from public disclosure.

(1) Theory of Operation

Above mentioned document contains detailed system and equipment description are considered as proprietary information in operation of the equipment. The public disclosure of above documents might be harmful to our company and would give competitor an unfair advantage in the market.

In addition, please be advised that Panasonic Corporation of North America hereby requests the following filed sensitive information to be held under **short-term** confidential, pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's Rules and the provisions in FCC Public DA 04-1705. We request temporarily confidentiality of 45 days, starting from the original issued Certification grant date.

(1) Test Setup Photographs

Panasonic also acknowledges that we will provide appropriate notice to UL Japan should either of the following occur.

- If we require additional 45-day extension period, we will notify UL Japan with a new request letter at least seven days prior to the short-term confidentiality expiration date [Note: up to a maximum of 3 extensions only allowed], or
- We will immediately notify UL Japan in the event the information regarding the product or the product is made available to the public. UL Japan will then release the documents listed above for public disclosure, pursuant to FCC Public Notice DA 04-1705.

Sincerely,



Ben Botros
Manager – Regulatory & compliance
Panasonic Corporation of North America