

**From:** oetech@fcc.gov [mailto:oetech@fcc.gov]  
**Sent:** Friday, 9 December 2016 6:52 AM  
**To:** Roger Pook <Roger.Pook@invenco.com>  
**Subject:** Response to Inquiry to FCC (Tracking Number 321622)

### **FCC response on 12/08/2016**

**Your request for confidentiality and the NDA is accepted.**

What is the TC number associated with the request.

#### **Attachment Details:**

[Signed request for confidentiality letter](#)

[Sales NDA sample extract](#)

---Reply from Customer on 12/07/2016---

Thank you for the response.

Attached will be a signed copy of the request for confidentiality request letter with the addition listed in the FCC response above, and a sample extract of the non-disclosure agreement between Invenco Group Limited and customers.

### **FCC response on 12/06/2016**

You will need to submit to the FCC a signed copy of the confidentiality request.

Your request should explain how access to the internal components of the device is restricted.

Acceptable methods have included physical measures to prevent access such as encasing the internal PCB with epoxy.

Other acceptable justification has included restricted installation with access to the internal PCB available only through signed NDA.

In the latter case an example NDA should be included I filing, however does not have to be signed by either party.

Additional guidance instructions are available by accessing FCC KDB Publication No. 726920 DO1 dated April 8, 2016.

Once the FCC has received the information stated above, we can proceed with your request.

## Office of Engineering and Technology

**Inquiry on 12/03/2016 :**

**Inquiry:**

Re: FCC ID: 2AC7B-G7UPC

Dear Sir or Madam,

Invenco Group Limited is in the process of applying for FCC certification our "G7 UPC".

In the application we requested confidentiality for the internal photographs of the circuit board, but this request has been rejected by the TCB Timco Engineering. (Contact: 849 N.W. State Road 45, P.O. Box 370, Newberry, Florida 32669, Email [info@timcoengr.com](mailto:info@timcoengr.com), Phone ( 352 ) 472-5500)

The G7 Unified Pinpad and Cardreader (UPC) is a security critical part of Invenco's Outdoor Payment Terminal for fuel dispensers.

The security and compliance of the Invenco G7 UPC product is compromised by the disclosure of the photographs of the internal circuit boards to unauthorized persons.

Disclosure of this information intentional or unintentional is potentially deemed liable by the financial institutions (i.e., AMEX, VISA, MasterCard, Discover & JCB) responsible for advancing and promoting the Payment Card Industry Data Security Standards.

Publication of the internal circuit board photographs would also expose Invenco's corporate intellectual property to competitors.

In summary we wish the internal photographs of the G7 UPC product to be kept confidential.

Yours faithfully,

Roger Pook  
Senior Validation Engineer  
Invenco Group Limited