



Federal Communications Commission
Equipment Approval Services
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Re: Certification request for the Symbol model LA-4137 Wireless LAN Compact Flash Card

FCC ID: H9PLA4137P

Date: June 29, 2001

To The Commission:

This certification request is for the Spectrum 24 model LA-4137 WLAN Compact Flash Card. The LA-4137 is a 2.4 GHz direct sequence IEEE 802.11(b) compliant radio incorporated into a Compact Flash Card package. This request is for certification of a Part 15 transmitting device operating under 15.247(c) and its associated antennas.

Symbol Technologies, Inc. manufactures information systems that are employed in commercial establishment to assist in controlling inventory. Spectrum 24 is a Wireless Local Area Network (WLAN) used along with hand held computers to assist in information collection typically in retail stores, warehouses, and factories.

The following files are electronically submitted as attachments.

Table with 3 columns: Exhibit Type, File Name, Confidential. Lists various PDF attachments like Block Diagram, Cover Letters, RF Exposure Info, etc.

Symbol Technologies, Inc. ("Symbol"), requests that the Block Diagram, Schematics, and Operational Description Exhibits of the above referenced application be withheld from routine availability for public inspection pursuant to Section 0.459 of the Commissions Rules and Freedom of Information Act ("FOIA") Exemption 4, 5 U.S.C. 552(b)(4).

These exhibits consist of "trade secrets [or] commercial or financial information obtained from a person and privileged or confidential", 5 U.S.C. 552(b)(4), and is therefore entitled to protection from disclosure under FOIA.

The documents in question contain trade secrets: detailed technical descriptions, specifications and schematics for a product to be offered for sale. These materials provide particulars on the product design that can be ascertained from inspection of the product itself only with extraordinary expenditures of time and effort, if at all. This information would give Symbol's would-be competitors an unearned and unwarranted competitive advantage.

Moreover, the documents contain "commercial information" within the scope of FOIA Exemption 4. This information is the product of Symbol's investment of money, personnel, and other resources. The result of that investment is a fairly earned position in the marketplace. Premature release of the information threatens substantial and unwarranted harm to Symbol's competitive position.

For these reasons, Symbol has taken pains to keep this technical information confidential, and intends to continue doing so. Symbol customarily withholds this information from persons outside the employ of Symbol and certain of its suppliers and contractors, and even within these groups routinely limits access to persons having a particular need for the information. If the Commission were to make these documents public, it would be giving away hard won fruits of Symbol's labors without compensation.

The filing fee required for this request was submitted by credit card as entered on Web based forms.

If there are any questions about this request, please call me at the number above.

Thank you for your attention.

Respectfully submitted,

Norman H. Nelson