



Radiodetection
A United Dominion Company

Radiodetection Limited
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United Kingdom

**FCC ID: K68ND2415A, K68ND2415B, K68ND2415C, K68ND2415D
- Application for Equipment Certification**

Request for Material to be Withheld from Public Inspection

Introduction

The Radiodetection Datasondes part numbers 10/ND2415-Y, 10/ND2415-P, 10/ND2415-G, 10/ND2415-OR are part of the Radiodetection Drilltrack system. The DrillTrack system is designed to provide the operator of a horizontal directional drill machine with information on the drillhead.

Request for Material to be Withheld from Public Inspection

For the reasons presented below, it is requested that the information detailed below is withheld from public inspection for a period of five years from its submission to the FCC by Radiodetection.

Identification of Confidential Information

Confidential treatment is being sought for the following information concerning all Radiodetection datasondes:

- schematic circuit diagrams
- manufacturing drawings
- description of circuit functions and operation of G2 Datasondes

A detailed list of confidential items is presented in Appendix 1

Reason for Submission

The information is submitted in support of an application for FCC certification of the datasondes.

Degree to which the Information is Confidential

The information is confidential for commercial and financial reasons because Radiodetection has invested considerable design effort and expense in developing the datasonde and the system with which it works.

Degree to which the Information concerns a Service subject to Competition

The datasonde is part of a system is designed to provide the operator of a horizontal directional drill machine with information on the drillhead. The market for products such as these is highly competitive. The system is sold to customers such as public utilities and telecommunications companies. The USA is Radiodetection's largest market.

Harm to Competitiveness Resulting from Disclosure of the Information

Design and development costs make a significant contribution to the overall costs of our products and those of competitors. The products' time-to-market depends to the time taken to complete the design phase. The disclosure of the information would give a competitor an unfair advantage by allowing it to reduce its design time and expenditure.

Measures taken to Prevent Unauthorized Disclosure

All Radiodetection designs are treated as 'Company Confidential'. Design information is not released to third parties, other than those providing sub-contact production services to Radiodetection. Sub-contractors are subject to confidentiality agreements.

Availability of the Information to the Public and Previous Disclosure to Third Parties

The information submitted to the FCC is not available to the public or published by Radiodetection in its technical literature or handbooks. Products are sold only by Radiodetection and its own agents. There has been no previous disclosure to third parties, other than sub-contractors covered by confidentiality agreements.

Justification for Period of Non-disclosure

A non-disclosure period of five years is requested to ensure the any future disclosure of Radiodetection's design will not take place until the datasonde and its design ideas are no longer of commercial value.

For and on behalf of Radiodetection Limited,



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Appendix 1

List of Confidential Information

Schematic Drawings

Drawing No.	Description	Electronic File
1) ND2415.A	DS/DF – G2 Output PCB	ND2415-A-1.pdf & ND2415-A-2.pdf
2) ND2416.A	DS/DF – G2 Micro PCB	ND2416-A-1.pdf & ND2416-A-2.pdf
3) RS1088.A	ROLL SENSOR TRACK BOARD	RS1088-A-1G.jpg
4) RS1089.A	ROLL SENSOR SEGMENT BOARD	RS1089-A-2A.jpg
Manufacturing Drawings and specifications		
5) NDND2415.V1 G2 SONDE GENERAL ASSEMBLY		ND1415-V1.jpg
6) ND1327.W2	RD385 HI POWER	ND1327-W2-SPEC.jpg
8)	antenna schematic	antenna schematic.doc
9)	Circuit functions and Operation	Circuit functions.doc
10)	Hardware Block Diagram	Hardware Diagram.doc
11)	Functional Diagram	Functional Diagram.doc