



INVOCON, INC.

INNOVATIVE CONCEPTS IN
SYSTEMS ENGINEERING

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9 September 1998

Mr. Errol Chang
Federal Communications Commission
Authorization and Evaluation Division
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

RE: FCC ID # NJM0929156 Confidentiality Request

Dear Mr. Chang,

It is our understanding that the last open issue regarding the subject application is the confidentiality request submitted by Invocon, Inc. We have discussed the issue at length with the FCC Office of Engineering and Technology. OET Representatives have stated that the regulations upon which we have based our request are not completely clear but that the OET stands by its past practice.

Therefore, we are modifying our request for confidentiality as follows. In accordance with 47 CFR §0.457 and §0.459 this letter is a request that the following items in the subject Equipment Authorization Application be kept confidential and withheld from public inspection. After each listed item is the reasoning to support the request.

- The Expository Statement

This Statement contains proprietary technical information. The Statement was specifically drafted for this FCC application. Any other description of the system for commercial purposes will be worded according to Invocon's marketing department. This description is considered proprietary and not to be released for public inspection. The public will receive an appropriate description in the marketing literature for the product; they need not acquire it via the application.

- Schematics
- Bill of Materials
- Block Diagrams

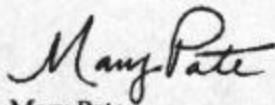
These items contain detailed technical specifications on the system and are considered by Invocon, Inc. to be company confidential trade secret data.

This application is directly related to another previous application for the "sister product" of the RDGU which is the CDCU (FCC ID #NJM0919156). The application for the CDCU has been granted and it included a request for confidentiality of items such as those listed above. That request was granted and the engineer in charge of that application was Mr. Joe Dichoso.

As with the CDCU application, we believe that this request for confidentiality on the RDGU is reasonable and not burdensome. Therefore, we respectfully request that the items listed above be granted confidentiality status.

If you have any questions, please contact the undersigned by phone (281-292-9903) or fax (281-298-1717). Please respond to this as soon as possible.

Best Regards,

A handwritten signature in cursive script that reads "Mary Pate".

Mary Pate
VP/General Counsel

cc: Steve Kaminer, OET Attorney