

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. N.W.

Re: File number 0157-EX-PL-2004 : Filed Electronically

Dear Mrs. Dortch

Cisco System requests confidentiality for the theory of operation filed as part of our request for an experimental license for the development of 802.11a/b/g Voice over IP phone. Per section 0.459 of the Commission rules , this letter requests confidential treatment of material in support of the above referenced application. Cisco submits the following in conformance of section 0.459 (b) of the Commission rules.

- 1) Identification of specific information to be held confidential
 - Document entitled “Theory of Operation” which includes a list of the radio parameters.
- 2) Identification of the Commission proceeding in which the information has been submitted
 - OET Experimental License Application File 0157-EX-PL-2004, filed July 30, 2004.
- 3) Explanation of degree to which information is commercial or financial or contains a trade secret.
 - The development of VoIP phones, specifically 802.11 based phones is highly competitive. The technical specifications provided are preliminary engineering specifications and operation features, not ready for public review or discussion.

4. Explanation of the degree to which the information concerns a service that is subject to competition.
 - . The Maximum power, features and such distinguish between the brands affects sales. The product we are requesting the license for will utilize the new 5GHz FCC bands as well as the new 4.9 Japan RLAN bands. The specifications of this new phone at this time if released will give our competitors insight to the technical specification of our new product before we are ready to release it in 2005.
5. Explanation for how disclosure of the information could result in substantial competitive harm.
 - The information contained in the referenced document represents a conceptual product design and specifications. If competitors have access to this document , they have knowledge of future Cisco pending business plans and cold use this information t their advantage. This could harm Cisco future efforts to introduce products in the future.
6. Identification of any measure taken by the submitting party to prevent unauthorized disclosure.
 - Information about Cisco's products under development is considered by the company to be commercially sensitive information that employees are not permitted to discuss outside the company.
7. Identification of whether the information is available to the public and the extent of any previous disclosure to third parties.
 - Cisco requests the above information not be made public for 18 months from this date.
8. Justification of the period during which the submitting party asserts the material should not be available to public.
 - Cisco requests a period of 18 months from this date that the material not be disclosed. This period will provide Cisco with adequate time to develop and certify the product.
9. Any other information that the party seeking confidential treatment believes may be useful in assessing whether it's request for confidentiality should be granted.
 - N/A

Sincerely

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