

From: Kana Udomon

To: Doug Young

Date: November 28, 2020

Subject: Request for Info - File # 0925-EX-CN-2020

Message:

01. QUESTION

Submit a narrative statement describing in detail the program of research and experimentation proposed, the specific objectives sought to be accomplished; and how the program of experimentation has a reasonable promise of contribution to the development, extension, or expansion, or use of the radio art, or is along lines not already investigated.

01. RESPONSE

This request for a temporary license is to support development of software, functional testing, and field testing for prototype telematics units for Agriculture, Construction, and Forestry machines. The specific objectives to be accomplished are software development, verification of cell, WLAN, BlueTooth, Ethernet, and CAN functionality.

The program of experimentation has a reasonable promise of contribution to the use of radio at by providing low cost telematics controllers for Agricultural and Construction & Forestry machines.

02. QUESTION

You have marked an exhibit as confidential. You must submit an item-by-item justification for the confidentiality request to answer the nine subsections of Part 0.459(b) of the FCC's rules. All non-confidential material must be separated from the confidential material and must be viewable by the public, as must the confidentiality justification.

02. RESPONSE

(1) Identification of the specific information for which confidential treatment is sought;

Block Diagram of Product Summary

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission;

The product summary was submitted to provide technical information regarding telematics prototypes to be used on Ag, Construction, and Forestry equipment.

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged;

The block diagram contains design information privileged to Deere.

(4) Explanation of the degree to which the information concerns a service that is subject to competition;

The block diagram contains design information for the design of a telematics controller for Ag, Construction, and Forestry machinery.

(5) Explanation of how disclosure of the information could result in substantial competitive harm; Disclosure of the block diagram will lead to release of design information.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure; Deere employees must have proper clearance to access design documents like functional block diagrams.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties;

Block diagrams are not available to the public.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure; and
Covers period prior to product release.

(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.
No other information.

03. QUESTION

Submit a justification for the large number of units.

03. RESPONSE

The number of units is to support field testing in approved locations (farms) in North American states.

04. QUESTION

Submit a justification for a nationwide license. The FCC does not like to approve nationwide use of an experimental license if the goals of the experiment can be accomplished in a much smaller area.

04. RESPONSE

The nationwide license is required due to perform field testing during different field and weather conditions.

05. QUESTION

This application looks very similar to 0742-EX-CN-2020, except for the number of units. Why couldn't this have been filed as a modification of station WL2XGD?

05. RESPONSE

Correct. The technical information is exactly the same --- the only difference is the number of units. I defer to your expertise.