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February, 3, 2011

Federal Communications Commission  
Office of Engineering and Technology  
Experimental Licensing Branch  
445 12th St., S.W.  
Room 7-A322  
Washington, DC 20554

To whom it concerns:

Innovative Signal Analysis respectfully requests that the documents entitled "ISA Experimental License WF2XL Amendment For Very Wide Band Analog Communication Channel at ISA Richardson Feb. 3, 2011," "ISA TL2400-U Block Up-Converter Specifications, and ISA TL2400-D Block Down Converter Specifications" submitted via the OET Electronic Filing System as attachments to Form 442, File Number 0030-EX-ML-2011, on Feb. 3, 2010, Confirmation Number EL727689 be held confidential under FCC rules § 0.459 (b).

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

Documents entitled:

"ISA Experimental License WF2XFL Amendment For Very Wide Band Analog Communication Channel at ISA Richardson Feb.3, 2011"  
"ISA TL2400-U Block Up-Converter Specifications, and ISA TL2400-D Block Down Converter Specifications"

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

OET Electronic Filing System attachments to Form 442  
File Number: 0030-EX-ML-2011  
Confirmation Number: EL72769  
Submitted February 3, 2011

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

The information contains commercial specifications and privileged trade secrets.

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

The information does not concern a service subject to competition.

(5) Explanation of how disclosure of the information could result in substantial competitive harm;

The aforementioned documents disclose a research project and technical specifications that would cause significant competitive harm. There are no known competitors developing a similar system. The technical details disclosed could allow competitors to reverse engineer a similar solution causing the loss of R&D and future revenue streams.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure;

Access to the information has been on a need-to-know basis within the company and has only been disclosed to limited interested US government officials.

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

This research project and its technical specifications have not been disclosed to the public but only to ISA employees, and associates thru relationships with the US government.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure;

The license period will allow ISA time to further develop the system and obtain government contract(s).

(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.

The research is being undertaken in the interest of a government contract which may have limits on disclosure.

ISA respectfully requests that these documents not be released to the public.

Best Regards,

Joel Guggenmos  
Sr. System Engineer