

FCC
OET Experimental Licensing Branch
Washington DC

RE: Request for confidentiality per FCC Rule Sections 0.457 and 0.459
Applicant: **AKELA INC**
STA File Number: **0205-EX-ST-2010**

Rationale for request for confidentiality:

AKELA INC has invested considerable time and materials in the development of their product. Disclosure of the confidential portions of this application to competitors would give them competitive advantage in developing similar products.

In accordance with the rules in CFR 47, Part 0.459(b):

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

Description of experiment

Description of equipment

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

AKELA seeks to conduct field testing and evaluation of a novel through-the-wall surveillance radar prototype. This technology development is funded by the National Institute of Justice (NIJ) to address a documented need for cost-effective, stand-off through-the-wall surveillance technology.

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

This technology is being developed towards the goal of producing a commercial product to be sold to law enforcement.

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

There are a number of companies with competing products using similar technology. Two examples of this are Camero's Xaver systems and L-3 Cytterra's EMMDAR.

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

Disclosure of information pertaining to how the radar operates would give AKELA Inc.'s competitors an advantage in developing similar products.

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

Information is not disclosed to the public.

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

Information is not available to the public. Any previous disclosure of the information to third parties required Non Disclosure Agreements.

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

The technology development is part of an ongoing effort to develop a commercial stand-off through-the-wall surveillance system. Disclosure of information pertaining to how the radar operates would give AKELA Inc.'s competitors an advantage in developing similar products and bringing them to the market before AKELA.

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

AKELA Inc. holds a current STA (File # 0581-EX-ST-2009) for a similar product which was approved for confidential filing. AKELA is now applying for a STA to test and evaluate a new generation radar sensor with enhanced frequency capabilities but otherwise similar operating characteristics and emissions.

If you have questions or need further information, please contact the undersigned.

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