

November 22, 1999

Federal Communications Commission
Experimental Radio Service
PO Box 358320
Pittsburgh, PA 15251-5320

Re: Confidentiality Request

Dear Sir or Madam:

In connection with the Application for Experimental Radio Station Authorization on FCC Form 442 filed herewith, Arthur D. Little, Inc. ("Applicant") hereby requests that the Federal Communications Commission (the "Commission") withhold information contained in such application from public inspection for three years from the date of disclosure. Applicant's reasons are as follows:

It is anticipated that if the proposed program of research and development is successful, such success may lead to future commercial activity. Applicant expects commercial activity in this market to be subject to competition. Applicant does not wish to publish details of any potential solution, whose market potential may be considerable, and where publication of any details of Applicant's intentions in this market would be prejudicial to its competitive position. In addition, the information described in the application involves activities of Applicant which are proprietary, and contains trade secrets concerning the design of possible future products.

The specific information Applicant requests to be withheld is:

1. Technical details (frequency, power, EIRP, modulation, bandwidth); and
2. Research and experimental program details (objectives, phases, duration, function, performance (range, resolution, relative speed, target size))

Disclosure of such information would allow competitors to identify the direction of Applicant's research and development, and therefore would weaken Applicant's competitive position in a market of substantial importance.

This information contained in the application is proprietary to Applicant and, as such, is subject to restricted distribution. It is not disseminated to the public and is released only under agreements with potential development partners or customers which provide for the protection of such proprietary information.

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The period Applicant has requested for non-disclosure is based on Applicant's expectation of the period before devices based on this work might become publicly available.

Very truly yours,

Arthur D. Little, Inc.

By: 

Elliot J. Mark
Associate General Counsel