

Reason for confidentiality



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To the Federal Communications Commission
Office of Engineering and Technology
Experimental Licensing System

Re: Responses to 47 CFR Part 459b
Regarding our request for Confidentiality
STA File # 0649-EX-ST-2004

Response to items of Federal Communications Commission CFR 47 § 0.459 Request for Confidentially.

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

Word document "Fleetwood EMC testing proposal to the FCC" 11/18/04

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

Fleetwood's application for STA File # 0649-EX-ST-2004

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

The information contained as to what we intend to test and the procedures is commercial in nature. The release of said information may have a negative financial impact on the company and the information pertains to a new vehicle design that is a trade secret and is privileged.

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

The item being tested is a new vehicle design and subject to direct competition.

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

Release of the information of what Fleetwood is testing may elude to what exactly the testing is being done on and may give direct competitors advance information of same.

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

Fleetwood's policy concerning this design is strictly confidential and has kept this design in a closed building since the programs inception. The area is kept locked and no one is allowed access without a prior screening and a signed NDA which we would not issue to an employee of any competition.

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

Fleetwood has not released any information concerning this new design to the general public and has only allowed select vendors that have products included in the design to have any access and only after signing an NDA. The majority of Fleetwood employees do not even have access to this new design!

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

None of the information required to obtain this license should be disclosed to the public until such time as Fleetwood engages in the production of this new design slated to begin in September of 2005. At the very least the details of what Fleetwood intends to test should not be made public. At such time Fleetwood will notify the FCC that no further need for confidentiality exists.

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

Based on the possibility that Fleetwood might be financially impacted were a competitor gain access to the details of what Fleetwood has designed and now wishes to test we assert that said disclosure could be potentially damaging and we request that the FCC not disclose this information until released by Fleetwood.