



July 11, 2013

Federal Communications Commission
Office of Engineering and Technology
445 12th Street SW
Washington, DC 20554

Re: FCC Form 442 Request for Confidential Treatment Pursuant to
47 CFR §0.457 and 47 CFR § 0.459 for FCC Form 442 Exhibit

To whom it may concern:

iRobot Corporation hereby requests that the FCC Form 442 exhibit ("Statement of Public Safety Contracts") disclosing existing/open contracts with local public safety entities requiring the use of the 4.9 GHz frequency band be held confidential and withheld from public inspection pursuant to 47 CFR §0.457 and 47 CFR § 0.459. Non-disclosure is also consistent with the exception for confidential commercial information under the Freedom of Information Act, 5 USC 552(b)(4). A redacted version of this exhibit is attached to this letter.

As set forth in 47 CFR § 0.459(b), iRobot requests that the list of the ten (10) local public safety customers and the corresponding PO/contract numbers be treated as confidential. iRobot is submitting the exhibit in order to demonstrate its need to use the 4.9 GHz band in order to fulfill the requirements of these public safety contracts.

This list of local public safety customers is commercial information that should not be available for public inspection as set forth in 47 CFR §0.459(b)(3). Disclosure of these public safety entities could result in substantial competitive harm to iRobot pursuant to 47 CFR §0.459(b)(3) as the identification of our customers would provide existing and potential competitors with competitive advantages through the ability to target customers without making the substantial investment in sales contacts that iRobot has made.

In addition, public safety customers, including police departments and SWAT teams, given the sensitive nature of their work, often prefer to keep a close hold on information related to their use of particular tactical equipment such as the iRobot PackBot and iRobot FirstLook robots. These tactical robots are used to perform a variety dangerous missions, such as dangerous searches, reconnaissance, building and route clearance, and bomb-disposal.

iRobot has treated the list of local public safety customers as confidential so as to prevent unauthorized disclosure pursuant to 47 CFR §0.459(b)(6). iRobot has not disclosed the local public safety customer list publically or to third parties as set forth in 47 CFR §0.459(b)(7).

iRobot Corporation

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As required under 47 CFR §0.459(b)(8) iRobot requests that the exhibit be held confidential concomitant with the term of the experimental license for which it is applying (60 months) or if the license application is denied, for an equivalent 60 month period.

iRobot appreciates your thoughtful consideration of this request.

Respectfully,

A handwritten signature in blue ink, appearing to read "Glen D. Weinstein", written over the typed name and title.

Glen D. Weinstein
EVP & Chief Legal Officer