

31 May 2000

Via Electronic Filing

Federal Communications Commission
EQUIPMENT APPROVAL SERVICES
P.O. Box 358315
Pittsburgh, PA 15251-5315

Re: FCC ID No.: A92COM320 Class II Permissive Change
Applicant: Texas Instruments
Filed: May 31, 2000

Dear Sir or Madam:

Request for Confidential Treatment

Texas Instruments Incorporated (“TI”) requests that the materials described below be withheld from public disclosure in accordance with Section 0.459 of the Commission’s Rules, 47 C.F.R. § 0.459 (1999), following grant of the application. In support of this request, TI submits the following:

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

Analog RFM (TI PN RI-RFM-0320), Attachments 2a , b & c (Adobe Acrobat files *.pdf), which include the following:

- a) Electrical Schematic, Drawing # 00121-A-01 (5 pages), 00121-A-01.pdf
- b) Bill of Material, Drawing # 00121-H-01 (9 pages), 00121h99.pdf
- c) PWB Artwork, Drawing # 00121-C-01 (9 pages), 00121-C-01.pdf

Please note that the test report (“Com320CLII.pdf”), attachment 1 (description of reader system and its components, a92tidesc.pdf), and photographs (“A92CIISWRI.pdf” & “A92CIIEUT.pdf”) of this application do not require confidentiality after the grant of the application.

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

The proceeding is that involving the application for equipment authorization (certification) under FCC ID No.: A92COM320.

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



This material includes circuit diagrams (schematics), the bill of materials for the device, and printed wiring board artwork. As such, this material is treated as highly confidential business information.

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

The material for which confidentiality is sought is employed in the design and manufacture of radio frequency identification equipment that is offered on a highly competitive basis. Customers for this equipment have a variety of competing sources of supply.

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

Disclosure would, in effect, give away the fruits of the labors of TI engineering personnel, who have designed the equipment and the manufacturing processes. Disclosure would also offer competitors additional unwarranted insight into the state of product development thereby allowing such competitors an advantage that would not be available to TI.

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

The information for which confidential treatment is sought is kept confidential by TI and not made available to third parties except pursuant to non-disclosure agreements.

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

To the knowledge of those preparing this application, the information has not been disclosed publicly heretofore. While the general theory of operation of this RF ID equipment has been the subject of numerous disclosures in industry and standards groups as well as in rule making proceedings at the FCC, the protection sought is narrowly drawn and pertains to certain specific implementations of RF ID technology.

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

This material should not be disclosed for at least 5 years. While improvements in design are made relatively frequently, disclosure of the design information would lead to insights into both designs and manufacturing techniques and could have an adverse competitive effect for many years to come. This equipment is designed for commercial, industrial, and governmental transportation applications. Moreover, this equipment will be used in revenue collection applications and secure access applications involving access to locations and machinery. As such, it is important that its design not be made available to unauthorized persons who might attempt to use knowledge of the design to compromise the applications for which the equipment will be employed.



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

See item 8 above. Note that the equipment for which approval is being sought will be employed in applications that inherently carry a premium on security.

Should you have any questions regarding the matters addressed herein, please do not hesitate to contact me at (972) 995-0317 (r-roebuck@ti.com). Also, we are moving our office on June 22 and the new address/phone number is: 6550 Chases Oakes Blvd, MS 8470, Plano, TX 75023, Phone 972-575-2523.

Respectfully submitted,

By: /s/ Randal D. Roebuck
Randal D. Roebuck
Engineer