

Allen Telecom requests that Exhibit 10 of the attached application for equipment certification be treated as confidential for a period of two years under Section 0.459 of the FCC rules, and submits the following information in support of that request:

1. Identification of the specific information for which confidential treatment is sought:

Exhibits 10A through 10N in the attached application for BCR9GB2000D equipment certification

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

This equipment is part of an equipment certification filing.

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

The information in Exhibit 10A through 10N contains detailed schematics and parts lists that would be of substantial commercial or financial value to Allen Telecom's competitors.

4. Explanation of the degree to which the information concerns a service that is subject to competition:

The information relates to equipment design rather than a service, but the supply of such equipment is highly competitive.

5. Explain how disclosure of the information will cause competitive harm to the applicant:

Allen Telecom has invested large sums of money in research and development, leading to innovative technological advances that are described in this information. Disclosure of the information would allow Allen Telecom's competitors to duplicate critical areas of circuit design. This would have the result that Allen Telecom would lose the competitive benefits of R&D and innovations that it has paid for.

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

Allen Telecom requires its employees to sign confidentiality agreements and consultants to sign 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;

The information for which Allen Telecom is seeking protection is not available to the public, and is not available to third parties except in those few cases where a non-disclosure agreement has been signed.

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

Allen Telecom seeks protection for a period of two years after the grant of an equipment authorization. We believe that, because of the pace of technological advances, after this period of time the competitive harm caused by disclosure will be substantially lessened.

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

Allen Telecom, as a company policy, does not publish detailed schematics and parts lists for its EAC-2000 product line. The EAC-2000 product line is sold world-wide, and it is Allen Telecom's intent to prevent duplication of its EAC-2000 product line in those countries that ignore the patent protection that Allen Telecom has on this product line.