



June 2, 2004

Mr. Yuriy Litvinov
TCB Reviewer
Intertek Testing Services NA, Inc.
7250 Hudson Blvd. Suite 100
Oakdale, MN 55128

Re: FCC ID No. DGF-SSD8210

Dear Yuriy:

Request for Confidential Treatment

3M Company (3M) requests that the material described below be withheld from public disclosure in accordance with Section 0.459 of the Commission's Rules, 47 C.F.R. § 0.459 (2002), following the grant of application. In support of this request, 3M submits the following

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

Electrical Schematic of the 3M Reader, Drawing # 78-8023-7800-4 Rev. 5 (1 sheet),
PWA-3M Reader 78-8023-7800-4 Rev 5{sheet 1}.pdf

Electrical Design Document, Document # DOC-EDD-M700 (25 sheets),
DOC_EDD_M700.pdf

3M Reader Photographs, 3M Reader Photographs.pdf

Parts List, 8210 Parts List.pdf

Block Diagram, 8210 Block Diagram.pdf

Internal Photographs, 8210 Internal Photographs.pfd

2. 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) and circuit descriptions. As such, this material is treated as highly confidential business information. The 3M Reader is a proprietary design that is held in strict confidentiality. This unit is to be worked on only by 3M personnel. All service personal are trained and authorized by 3M and are under 3M confidentiality agreement. Even with this precaution, if the unit fails in the field it is to be replaced with a working reader and the bad unit is to be returned to the company for repair. No non-3M employees are allowed access to the reader.

3. 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 competitive basis. Customers for this equipment have a variety of competing sources of supply.

4. Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure would, in effect, give away the design efforts of the 3M engineering personal, who have designed the equipment and manufacturing process. Disclosure would offer competitors additional unwarranted insight into the state of the product development that would allow those competitors an advantage that would not be available to 3M.

5. Identification of any measures taken to the submitting party to prevent unauthorized disclosure:

The information for which confidential treatment is sought is kept confidential to 3M and not made available to any third parties except in pursuant to non-disclosure agreements.

6. 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. While the general theory of the operation of this RFID 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 RFID Technology.

7. 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 design and manufacturing techniques and could have an adverse

competitive effect for many years to come. This equipment is designed for commercial, industrial, and government applications. As such, it is important that its design not be made available to unauthorized persons who might attempt to use this knowledge of the design to compromise the applications for which the equipment will be employed.

8. 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 7 above. Note that the equipment for which approval is being sought will be employed in applications that inherently carry a premium of security.

If you have any questions or need any further information, please do not hesitate to contact me at (651) 778-6279 (rdkuhn1@mmm.com).

Respectfully submitted,

Roger D. Kuhn
SEMS - EMC Laboratory
Building 76-1-01
St. Paul, MN 55144-1000