



Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Jan. 07/2009

Subject: **FCC CONFIDENTIALITY FORM**

Gentlemen:

the **3M Deutschland GmbH** requests that the material described below be withheld from public disclosure in accordance with Section 0.457 and 0.459 of the Federal Communications Commission's Rules, 47 C.F.R. following the grant of application FCC ID: **DGFTTS1200**. In support of this request, 3M submits the following:

- #05a_IntPho_Internal Photos
- #05b_IntPho_3M Reader Photographs
- #05c_IntPho_1200 Antenna Photos
- #07_OpDes_General technical description
- #08_Blck_Block diagram
- #09a_Schem_Electrical Diagram
- #09b_Schem_Cable Assembly
- #09c_Schem_3M Reader Schematics
- #09d_Schem_3M RFID Reader Circuit Description

The above material contains trade secrets or technical data, which would customarily be guarded from competitors. We do not want these documents to be accessible to the general public.

1. 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 model 1200 is a proprietary design that is held in strict confidentiality. This unit is to be worked on only by 3M personnel. All service personnel 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.

2. 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.

3. 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.

4. 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.

5. 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, the protection sought is narrowly drawn and pertains to certain specific implementations of RFID Technology.

6. 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.

7. 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.

Sincerely,

3M Deutschland GmbH
Safety, Security & Protection Services Laboratory

i.A.


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