

February 1, 2011

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

Re: FCC ID number: DGFTTS9100
Industry Canada IC: 458A-TTS9100

Request for Confidential Treatment

Dear Yuriy:

3M requests that the material described below be withheld from public disclosure in accordance with Industry Canada RSP-100 section 10, 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:

Reader schematics under file name: 9100 Schematics.pdf

Reader bill of materials under file name: 9100 Parts List.pdf

Reader block diagram under file name: 9100 Reader Block Diagram.pdf

Circuit description under file name: 9100 Reader Operational Description.pdf

Reader internal photographs under file name: 9100 Internal Photos.jpg

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 Reader is a proprietary design that is held in strict confidentiality. 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. Note that the equipment for which approval is being sought will be employed in applications that inherently carry a premium of security.

Respectfully submitted,

Robert E. Heller
Senior EMC Engineer, 3M Company