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Federal Communications Commission
Equipment Approval Services
P.O. Box 358315
Pittsburgh, PA 15251-5315

Re: Certification request for the Symbol model DP4046 Spectrum 24® DS Data
           Phone

Date: June 16, 2001

To The Commission:

This certification request is for the Spectrum 24® model DP4046 **Spectrum 24® DS Data Phone**. The DP4046 is a wireless phone and integrated bar code scanner utilizing the model DM4046 2.4 GHz direct sequence IEEE 802.11 compliant transceiver. The DM4046 radio is the radio in the previously certified model NP4046. This request is for approval of a Part 15 transmitting device operating under 15.247(c) and its associated antennas for this phone type device.

Symbol Technologies, Inc. manufactures information systems that are employed in commercial establishment to assist in controlling inventory. Spectrum 24® is a Wireless Local Area Network (WLAN) used along with hand held computers to assist in information collection typically in retail stores, warehouses, and factories.

The following files are electronically submitted as attachments.

Exhibit Type	File Name	Confidential
Block Diagram	DP4046 BlkDia.pdf	X
Cover Letters:	DP4046 Cover Letter.pdf	
Attestation Statements	DP4046 DOC.pdf	
External Pictures	DP4046 Ext Pics.pdf	
Internal Pictures	DP4046 Int Pics.pdf	
ID Label/Location Info	DP4046 Label.pdf	
Operational Description	DP4046 OpDesc.pdf	X
Test Report	DP4046 ProcGain.pdf	
RF Exposure	DP4046 RF Exposure.pdf	
RF Exposure	DP4046 SAR Rpt.pdf	
RF Exposure	DP4046 SAR PlotPrim.pdf	
RF Exposure	DP4046 SAR PlotAux.pdf	
Schematics	DP4046 Schem.pdf	X
Test Report Photos	DP4046 Test Pix.pdf	
Test Report	DP4046 Tst Rpt.pdf	
User Manual	DP4046 User Man.pdf	

Note that the RF Exposure exhibit contains all of the antenna information. There are 2 internal antennas included in this submission.

Symbol Technologies, Inc. ("Symbol"), requests that the Block Diagram, Schematics, and Operational Description Exhibits of the above referenced application be withheld from routine availability for public inspection pursuant to Section 0.459 of the Commissions Rules and Freedom of Information Act ("FOIA") Exemption 4, 5 U.S.C. 552(b)(4).

These exhibits consist of "trade secrets [or] commercial or financial information obtained from a person and privileged or confidential", 5 U.S.C. 552(b)(4), and is therefore entitled to protection from disclosure under FOIA.

The documents in question contain trade secrets: detailed technical descriptions, specifications and schematics for a product to be offered for sale. These materials provide particulars on the product design that can be ascertained from inspection of the product itself only with extraordinary expenditures of time and effort, if at all. This information would give Symbol's would-be competitors an unearned and unwarranted competitive advantage.

Moreover, the documents contain "commercial information" within the scope of FOIA Exemption 4. This information is the product of Symbol's investment of money, personnel, and other resources. The result of that investment is a fairly earned position in the marketplace. Premature release of the information threatens substantial and unwarranted harm to Symbol's competitive position.

For these reasons, Symbol has taken pains to keep this technical information confidential, and intends to continue doing so. Symbol customarily withholds this information from persons outside the employ of Symbol and certain of its suppliers and contractors, and even within these groups routinely limits access to persons having a particular need for the information. If the Commission were to make these documents public, it would be giving away hard won fruits of Symbol's labors without compensation.

The filing fee required for this request was paid by credit card electronically.

If there are any questions about this request, please call me at the number above.

Thank you for your attention.

Respectfully submitted,

Norman H. Nelson