

May 13, 2019

Timco Engineering Inc.  
849 NW State Road 45  
Newberry, FL 32669

Applicant: Rohde & Schwarz Inc  
2255 N. Ontario St., Suite 150  
Burbank, CA 91504

Re: Confidentiality for Internal Photograph Exhibit

FCC ID: HFLTLU9T

Dear Sirs:

Rohde & Schwarz Inc requests that the Internal Photographs Exhibit be withheld from public disclosure pursuant to Sections 0.457 and 0.459 of the Commission's Rules following grant of the application. In support of this request, Rohde & Schwarz Inc submits the following information.

**CONFIDENTIAL FILES**

**TLU9 Conf IntPho.pdf**

There are multiple reasons for having the shielding screens over certain areas of the PCBs shown in the internal photographs. First, the manufacturer seeks long term confidentiality regarding these items as this information even with the shielding could provide an unfair advantage to another manufacturer.

Per FCC 0.457 (d) (ii) and 0.459 (b) requirements, this information is not accessible by the public. Because of the following, I believe this situation meets the requirements as laid out by 457 & 459 relevant sections.

This equipment is located in building rooms where public access is not permitted. The doors are locked and TV station personnel or their trained contractors are the only people who are permitted access. This information consisting of these internal photographs is requested to receive long-term confidentiality.

Secondly, the shielding screens are not user adjustable and made in such a way that only trained factory personnel with special tools can remove these without the potential for damage to the boards.

Pursuant to 459 (b)

- (1) The specific information is the set of internal photographs of the TLU9.
- (2) The commission proceeding will be the equipment authorization application
- (3) The document is easily justified as trade secret. Other competitors may accomplish the same function but by a much different approach.
- (4) Irreparable damage may be caused to R & S as the DTV transmitter market is over \$100 M this year and R & S shares a significant percentage of this revenue.
- (5) If competitors were to duplicate the R & S approach then the competitors could acquire a significant market share by making the same product claims and even claiming to implement the R & S features
- (6) The internal photographs are not included in the user manual nor are they available via a public request from R & S
- (7) There is no public access to these internal photos. The info can be shared with trained contractors who require documents to troubleshoot problems.
- (8) The time period of 25 years is sufficient for confidentiality as by that time, typically new and better methods of accomplishing designs occur.
- (9) Treating proprietary info as confidential in one industry sets a precedent for other industries so as to permit competition that is fair and yields better products for the industry.

Should you require any further information, please contact the undersigned. Thank you for your consideration in this matter.

Sincerely,

*Scot D Rogers*

Scot Rogers