

**Intermec Technologies Corporation**  
Amtech Systems Division  
8600 Jefferson St. NE  
Albuquerque, NM 87113  
Phone: (505) 856-8054  
Fax: (505) 857-0715  
E-mail: [wmays@asctmd.com](mailto:wmays@asctmd.com)

May 17, 2000

Federal Communications Commission  
Equipment Authorization Division  
7435 Oakland Mills Road  
Columbia, MD 21046

RE: Request for Confidential Treatment  
FCC ID No: HN2-F4-915-LP

Dear Sirs:

Amtech Systems Division of Intermec Technologies Corp. requests that the materials in the Block Diagram, Schematics, and Operational Description be withheld from public disclosure in accordance with Section 0.459 of the Commission's Rules, 47 C.F.R. § 0.459 (1998), following grant of the application. In support of this request, Intermec submits the following:

**(1) identification of the specific information for which confidential treatment is sought:**

The materials set forth in the Operational Description, Block Diagram, Parts List, and Schematics, which are segregated from the non-confidential exhibits of the application, are those for which confidentiality is sought.

**(2) identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:**

The proceeding is that involving the application for equipment authorization (certification) under FCC ID No.: HN2-F4-915-LP

**(3) explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:**

This material includes detailed theory of operation, circuit diagrams (schematics and blocks), and parts list. As such, this material is treated as highly confidential business information

**(4) 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 (RFID) transmitting equipment that is offered on a highly competitive basis. Customers for this equipment have a variety of competing sources of supply.

**(5) explanation of how disclosure of the information could result in substantial competitive harm:**

Disclosure would, in effect, give away the fruits of the labors of Intermec's engineering personnel, who have designed the equipment and the manufacturing processes. Disclosure would also offer competitors additional unwarranted insight into the state of product development thereby allowing such competitors an advantage that would not be available to Intermec.

**(6) identification of any measures taken by the submitting party to prevent unauthorized disclosure:**

The information for which confidential treatment is sought is kept confidential by Intermec and not made available to third parties except pursuant to non-disclosure agreements.

**(7) 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 heretofore. While the general theory of operation of this non-multilateration 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 modulated backscatter radio technology.

**(8) 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 25 years. While improvements in design are made relatively frequently, disclosure of the design information would lead to insights into both designs and manufacturing techniques and could have an adverse competitive effect for many years to come. This equipment is designed for commercial, industrial, and governmental transportation applications. As such, unlike most consumer equipment, it is expected to be used for more than a decade in some cases. Moreover, this equipment will be used in revenue collection (e.g. toll collections) and secure access control applications (e.g. freight handling facilities). As such, it is important that its design not be made available to unauthorized persons who might attempt to use knowledge of the design to compromise the applications for which the equipment will be employed.

**(9) 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 8 above. Note that the equipment for which approval is being sought will be employed in applications that inherently carry a premium on security.

Respectfully,

Wesley M. Mays  
Engineering Manager  
Amtech Systems Division  
Intermec Technologies Corporation