

ROGERS LABS, INC.

4405 West 259th Terrace Louisburg, KS 66053 Phone / Fax (913) 837-3214

December 12, 2007

Timco Engineering Inc. Federal Communications Commission

849 NW State Road 45 Equipment Approval Services

Newberry, FL 32669 P.O. Box 35815, Pittsburgh, PA 15251-3315

Applicant: Garmin International, Inc. Equipment: FCC ID: IPH-01180
1200 East 151st Street CORES number: 0005-0885-88

Olathe, KS 66062

FCC Rules: Parts 2 and 15.249

Gentlemen:

The 731 form and application have been electronically submitted and any attachments will be up loaded to your web site to be used in obtaining a grant of certification. Confidentiality is requested as outlined below.

Short-term

Pursuant to DA 04-1705 of the Commission's pubic notice, we request **short-term confidential treatment** for the following information until 45 days after the Grant Date of Equipment Authorization in order to ensure sensitive business information remains confidential until the actual marketing of the device:

External Photos ExtPho 01180.pdf
Internal Photos IntPho 01180.pdf
Test Setup Photos Tsup 01180.pdf
User Manual UserMan 01180.pdf

Permanent

Garmin International, Inc. requests that the material in the **Parts List**, **Schematics**, **block diagram**, and **Operational Description** be withheld from public disclosure in accordance with Section 0.459 of the Commissions Rules, 47 C.F.R. 0.459, following grant of the application.

It is requested that the information contained in the operational description, block diagram, parts list, and schematics of the application be held confidential per Section 0.459. A statement of confidentiality will be attached with the application at the time of submittal.

Schematics Conf Schem 01180.pdf
Block diagram Conf BlkDia 01180.pdf
Operational Description Conf OpDes 01180.pdf

Should you require any further information, please contact the undersigned.

Thank you for your consideration in this matter.

Sincerely,

Scot Rogers Rogers Labs, Inc. Enclosures

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