



Garmin International, Inc.
 1200 East 151st Street
 Olathe, Kansas 66062
 P: 913-397-8200 F: 913-397-8282

SUBJECT: Confidentiality Request; FCC ID: IPH-A04111, IC: 1792A-A04111

Pursuant to FCC 47 CFR 0.457(d) and 0.459 and IC RSP-100, Section 9.4, the applicant requests that a part of the application be held confidential.

| Exhibits | Long-Term Confidentiality | Short-Term Confidentiality |
|---|---|--|
| Block Diagram | <input checked="" type="checkbox"/> Long Term / Permanent | |
| Schematic | <input checked="" type="checkbox"/> Long Term / Permanent | |
| Operation Description/Theory of Operation | <input checked="" type="checkbox"/> Long Term / Permanent | |
| External Photos | | <input checked="" type="checkbox"/> Short Term |
| Internal Photos | | <input checked="" type="checkbox"/> Short Term |
| Test Setup Photos | | <input checked="" type="checkbox"/> Short Term |
| User's Manual | | <input checked="" type="checkbox"/> Short Term |

Garmin International, Inc. has spent substantial effort in developing this product and it is one of the first of its kind in industry. Having the subject information easily available to "competition" would negate the advantage they have achieved by developing this product. Not protecting the details of the design will result in financial hardship.

Long-Term Confidentiality:

The applicant requests the exhibits listed above as permanently confidential be permanently withheld from public review due to materials that contain trade secrets and proprietary information not customarily released to the public.

Short-Term Confidentiality:

The applicant requests the exhibits selected above as short term confidential be withheld from public view for a period of 180 days from the date of the Grant of Equipment Authorization and prior to marketing. This is to avoid premature release of sensitive information prior to marketing or release of the product to the public. Applicant is also aware that they are responsible to notify the TCB in the event information regarding the product or the product is made available to the public. The TCB will then release the documents listed above for public disclosure pursuant to FCC Public Notice DA 04-1705.

NOTE for Industry Canada Applications:

IC currently only distinguishes Permanent Confidentiality exhibits as shown above. Short Term confidentiality is not considered applicable to IC applications.

Sincerely,

Cody Riggle
 Compliance Engineer