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1 October 2002

FCC ID: K68AA2614 Application for Equipment Certification

Request for Material to be Withheld from Public Inspection

Introduction

The Radiodetection 20ft Vector Bar (part number 10/AA2614) is used in conjunction with other Radiodetection products, designed to locate signals imposed on under ground cables. The Vector Bar communicates with a receiver, which displays information on the cable being located.

Request for Material to be Withheld from Public Inspection

For the reasons presented below, it is requested that the information detailed be withheld from public inspection for a period of five years from its submission to the FCC by Radiodetection.

<u>Identification of Confidential Information</u>

Confidential treatment is being sought for the following information concerning the Radiodetection 10/AA2614 20ft Vector Bar:

- schematic circuit diagrams
- internal photographs

A detailed list of confidential items is presented in Appendix 1

Reason for Submission

The information is submitted in support of an application for FCC certification of the 10/AA2614 20ft Vector Bar.

Degree to which the Information is Confidential

The information is confidential for commercial and financial reasons because Radiodetection has invested considerable design effort and expense in developing the 20ft Vector Bar and the system with which it works.

Degree to which the Information concerns a Service subject to Competition

The 20ft Vector Bar is part of a system, designed to provide the operator of a with information on the position of underground cables. The market for products such as



these is highly competitive. The system is sold to customers such as public utilities and telecommunications companies. The USA is Radiodetection's largest market.

Harm to Competitiveness Resulting from Disclosure of the Information

Design and development costs make a significant contribution to the overall costs of our products and those of competitors. The products' time-to-market depends to the time taken to complete the design phase. The disclosure of the information would give a competitor an unfair advantage by allowing it to reduce its design time and expenditure.

Measures taken to Prevent Unauthorized Disclosure

All Radiodetection designs are treated as 'Company Confidential'. Design information is not released to third parties, other than those providing sub-contact production services to Radiodetection. Sub-contractors are subject to confidentiality agreements.

Availability of the Information to the Public and Previous Disclosure to Third Parties

The information submitted to the FCC is not available to the public or published by Radiodetection in its technical literature or handbooks. Products are sold only by Radiodetection and its own agents. There has been no previous disclosure to third parties, other than sub-contractors covered by confidentiality agreements.

Justification for Period of Non-disclosure

A non-disclosure period of five years is requested to ensure the any future disclosure of Radiodetection's design will not take place until the DataSonde and its design ideas are no longer of commercial value.

For and on behalf of Radiodetection Limited,

Keith Jones Approvals Engineer



Appendix 1

List of Confidential Information

Drawing

AG 2669.A

AG 2670.A

AG 2671.A

AG 2672.A

AG 2673.A

Parts lists

AG 2669.D

AG 2670.D

AG 2671.D

AG 2672.D

AG 2673.D

Block diagram of Vector Bar 20 ft

Operational/Product Description/Technical Description

