



10 June 2002

**FCC ID: K68ND2585**  
**Application for Equipment Certification**

**Request for Material to be Withheld from Public Inspection**

Introduction

The Radiodetection Wireline DataSonde (part number ND2585 is part of the Radiodetection Drilltrack system. The DrillTrack system is designed to provide the operator of a horizontal directional drill machine with information on the drillhead.

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.

Identification of Confidential Information

Confidential treatment is being sought for the following information concerning the Radiodetection ND2585 DataSonde:

- 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 ND2585 DataSonde.

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 DataSonde and the system with which it works.

Degree to which the Information concerns a Service subject to Competition

The DataSonde is part of a system is designed to provide the operator of a horizontal directional drill machine with information on the drillhead. 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 on 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 that 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**

Keith Jones  
Approvals Engineer



# Appendix 1

## List of Confidential Information

### Drawing

ND 2545-flexy

ND 2445-layout

ND 2545-output

ND 2545-psu

ND 2546-filter

ND 2546-flexy

ND 2546-layout

ND 2546-power blocks

ND 2546-processor

ND 2546-rx

ND 2546-sensors

ND 2545.D Output PCB parts list

ND 2546.D Processor PCB parts list

Block diagram of DataSonde wireline system

