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June 24, 2011

Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, Maryland 21046

To whom it may concern,

We hereby respectfully request that, under the provisions of 47 CFR § 0.459, the documents listed below and attached with this application for certification be provided with confidential status and not made routinely available for public inspection:

- (1) Schematics.pdf
- (2) Operational Description.pdf
- (3) Frequency Block Diagram.pdf

Any exhibit/information for which we have requested confidentiality, but which may not be accorded such treatment by the FCC, should be returned to us.

The documents listed above contain company trade secrets. Significant engineering resources were expended designing the parts of the product shown in the schematics, frequency block diagram, and operational description. It is our belief that it would be difficult to reverse-engineer the product from publicly available information (including the product itself).

Substantial competitive harm to us could therefore result should these documents be made available to the public. We face both domestic and foreign competition in our market (locating equipment for horizontal directional drilling), including product piracy (attempts at direct knock-offs). Disclosure of the documents listed above would provide our competitors and potential product pirates with an unfair competitive advantage, by allowing them to copy our technical solutions without the development expense.

We protect this information through the following primary procedures: (1) all employees and contractors are required to sign nondisclosure agreements, as are any visitors, vendors or other third parties who may be exposed to any confidential information, and (2) the information is only provided to employees and third parties on a "need to know" basis. The information is not publicly available, and is not included in our operating manuals or on our website. We are not aware of the information listed above having been disclosed to any third party not bound by a nondisclosure agreement.

The materials listed above should not be available for public disclosure at any time. Our products can remain in service for extended periods of time (more than ten or fifteen years), and the rate of significant technological change in our industry is sufficiently slow that even the copying by our competitors of technical information from many years in the past could result in the creation of a product that might be competitively harmful to us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rudy Zeller', is written over a horizontal line.

Rudy Zeller