

GEHMAN LAW PLLC

December 5, 2007

CONFIDENTIAL TREATMENT REQUESTED UNDER 47 CFR §§ 0.457, 0.459

Mr. Julius P. Knapp, Chief
Mr. Tim Harrington
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554


Dear Messrs. Knapp and Harrington:

The undersigned is attorney for Axonn, L.L.C. This request for confidential treatment is submitted to Mr. Knapp pursuant to 47 C.F.R. § 0.459(d)(2), which provides that this request will be acted on by the appropriate Bureau or Office Chief. Mr. Harrington recently requested additional information from Axonn regarding equipment authorization. The attached letter responds to that request for information.

Confidential treatment of the attached letter is hereby requested pursuant to 47 C.F.R. §§ 0.457, 0.459. The attached letter is subject to 5 U.S.C. § 552(b)(4) ("Exemption 4") because the attached contains confidential trade secrets, commercial and financial information. The entirety of the attached letter is confidential. The attached describes the satellite services used, and contains certain financial information. It discusses the certification process and contains details of laboratory testing. It is submitted in response to the Commission's request for information pursuant to an audit. There are no or minimal barriers to entry for competitors to enter this market, and the attached is the type of information a competitor would seek when launching a competing service. Therefore, release would cause competitive harm.

Most or all of the attached has not been released publicly by Axonn. Axonn's equipment authorization application and supporting materials were submitted subject to confidential treatment. Confidential treatment is requested indefinitely and return of the attached is requested once the audit is completed. I trust this demonstrates that the attached should be accorded confidential treatment. However, if you have a question, please contact me at (202) 223-1177.

Very truly yours,


Julian P. Gehman