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August 22, 2000

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

Dear Sir or Madam:

In reference to the application under FCC ID LV2AX630 for the Axonn Corporation AX-630 Transmitter, 0644-0100, we hereby request that the following materials submitted with the application be withheld from public disclosure:

Exhibit I Block Diagrams Exhibit II Schematics
Processing Gain Information for Receiver

Each Exhibit covered by the instant request is marked on the cover page to each. In support of its request for confidentiality, the following is stated.

The subject device employs the emerging technology, spread spectrum. Research and development of this technology for commercial applications by the public is being explored by a number of entities and companies. The developer of the technology used to produce the instant device, Axonn Corporation, has emerged as one of the industry leaders and has gained a competitive edge over its competition by employing creative and functional circuit designs and production methods. This competitive position has been carefully cultivated and promoted to the benefit of Axonn and its licensees of its technology.

Axonn Corporation foresees that this Transmitter shall only be purchased and installed by professionals. We do not currently foresee ourselves making this product available over-the-counter to the average consumer.

The enclosed, close-up photographs of the circuit board clearly show each component and provide the ability to extract cost estimates with a high degree of accuracy. Additionally, these photographs provide enough information to allow an experienced engineer to extract a block diagram of the digital and RF portions of this circuit. If made public, these photographs and the information that can be derived from them might be used to the disadvantage of the applicant in the marketplace.

Axonn Corporation has obtained licenses and continues to file for patents to protect each new generation of its spread spectrum technology. However, as the commission is aware, the time period for grant of such protection does not accommodate the need to bring devices to the marketplace. Accordingly, Axonn Corporation desires to bring its devices to the marketplace without creating undue risk of duplication of technical, proprietary design.

To assist in assuring that Axonn Corporation receives the full value of its license and protects its competitive posture, Axonn Corporation respectfully requests grant of confidentiality for the photographs and Exhibits referenced in the first paragraph and which are attached to the application.

Best Regards,

David Alley

David Alley
Axonn Corporation