



May 14, 2001

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 L2VAX630 for the Axonn Corporation AX630 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

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.

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.

Best Regards,

David Alley  
Axonn L.L.C.