

Federal Communications Commission 7435 Oakland Mills Road Columbia, MD 21046 Attention:

Application Examiner Reviewing Engineer

Re: Request for confidentiality

Applicant: Topcon Positioning Systems, Inc.

FCC ID: LCB-050902

To whom it may concern,

Request is hereby submitted by Topcon Positioning Systems Inc., to withhold from public review certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) of the FCC Rules.

In particular, the following sections of the application are to be kept confidential:

- Schematics
- Detailed Block diagrams
- Detailed Operational/Functional Description

Rationale for request for confidentiality:

Topcon Positioning Systems, Inc. has invested considerable time and materials in research and development to produce the referenced product. Disclosure of the confidential portions of this application to competitors would not only give them significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by

If you have questions or need further information, please contact the undersigned.

Sincerely,

David E. Abercrombie GPS Product Manager

Topcon Positioning Systems, Inc.

Topcon Positioning Systems, Inc.

7400 National Drive Livermore, CA 94550 Phone: 925 • 245 • 8300

Fax: 925 • 245 • 8599