



Topcon Positioning Systems, Inc.
5758 West Las Positas Blvd.
Pleasanton, California 94588

April 11, 2003

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

Request for withholding from public disclosure proprietary information submitted pursuant to applications for certification.

Dear Sir or Madam:

Topcon Positioning systems inc. requests that certain materials submitted with this application for certification of HiPer + , HiPer Lite is withheld from public disclosure. This request is made under the provision of Section 0.457(d) of the Commission's Rule and Section 552(b)(4) of the Freedom of Information Act, Trade Secrets.

The items marked "Confidential" contain detailed block diagrams, schematic diagram, a parts list and a detailed theory of operation submitted to the FCC for review with this application. The information contains proprietary information (trade secrets) regarding the circuit operation and capabilities (specific values of components, circuit design details and system architecture), which are the result of our extensive investment in research and development. Without the disclosed information, competitive organizations would take considerable more time to assess and develop a workable competitive product.

As a result, we believe that disclosure of these company guarded materials would compromise our leading position in this market.

We therefore formally request that the materials marked "Confidential" be kept strictly confidential and not made available for inspection by any other party, except on a need to know basis for the sole purpose of the certification process.

A handwritten signature in black ink, appearing to read "Joe Brabec", is written over the typed name.

Joe Brabec
SVP Engineering
Topcon Positioning Systems, Inc