

National Technical Systems – Silicon Valley TCB 41039 Boyce Road Fremont, CA. 94538

July 9, 2013

Gentlemen:

This is your letter of authorization to accept our appointment of National Technical Systems – Silicon Valley. as our Agent for Topcon America Corporation, 7400 National Drive Livermore, CA. 94550, to sign applications before National Technical Systems – Silicon Valley TCB and to make representations to you on our behalf. National Technical Systems – Silicon Valley is to receive and exchange data between our company and National Technical Systems – Silicon Valley TCB.

I hereby certify on behalf of Topcon America Corporation, 7400 National Drive Livermore, CA. 94550 ("Applicant") that neither Applicant nor any party to the application (officers, directors, and 5% shareholders) is subject to a denial of Federal benefits that includes FCC benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988. 21 U.S.C. 853a.

Sincerely,

Ferdinand Riodique Compliance Engineer



June 19, 2013

National Technical Systems – Silicon Valley TCB 41039 Boyce Road Fremont, CA. 94538 FCC ID: LCB-860805

Dear Examiner:

I am writing to avoid the possibility of an inadvertent disclosure of proprietary information.

The accompanying Form 731 is being filed with the commission on our behalf by National Technical Systems – Silicon Valley, a consulting and testing laboratory. Included as exhibits with the enclosed application is a detailed description of the theory of operation of the device.

It is our intention to provide National Technical Systems – Silicon Valley TCB and the commission with a full disclosure of our product so that its merits can be evaluated. Indeed, we are pleased to provide any further information that the commission might wish to see. It is not our intention, however, to make our proprietary process a matter of public record.

In view of the fact that the associated theory of operation discloses the mechanism of our process, we ask that this portion (theory of operation) of our application be withheld from public inspection as provided under FCC section 0.457(d) and 0.459. These documents contain details of the proprietary operation of product. These details are not readily discernible - even to technically sophisticated individuals - from our hardware and constitute trade secrets.

We request therefore that this document be segregated from the body of our evaluation report and withheld from public inspection.

Thank you for your attention. Please let the undersigned know if National Technical Systems – Silicon Valley TCB or the Commission disagrees with our position or requires further justification.

Sincerely,

Ferdinand Riodique Compliance Engineer

Topcon Positioning Systems, Inc.

7400 National Drive, Livermore CA. 94550