ACLARA RF SYSTEMS
Formally HEXAGRAM, Inc.
30400 Solon Road.
Solon, OH 44139
440-528-7200

March 25, 2011

Federal Communications Commission
Office of Engineering and Technology
Equipment Approval Services
RE : Request for Confidentiality
Attached Form 731 – Application FCC ID: LLB09010B

Dear Sir or Madam:

Aclara RF Systems Formally Hexagram Inc. does not wish to publicly disclose certain technical information which is enclosed with this application.

Internal photos of this device are being requested to be held confidential and the device is sealed and disassembled would destroy the product.

This material contains critical trade secrets and we request that the Commission withhold this information from public inspection pursuant to the provisions of Section 0.457(d) and 0.459 of the Commissions Rules, and Section 552(b) (4) of the Freedom of Information Act.

MATERIAL TO BE HELD CONFIDENTIAL:

File Name	Description	Pages
LLB09010B	Internal Circuit Board Photo1.pdf,	One page
LLB09010B	Internal Circuit Board Photo2.pdf,	One page
LLB09010B	Internal Circuit Board Photo3.pdf,	One page
LLB09010B	Schematic.pdf Circuit Schematics	Two pages
LLB09010B	Bill Of Materials.pdf,	Three pages
LLB09010B	Block Diagram.pdf,	One page
LLB09010B	Operational Description.pdf,	One page

Aclara and its customers have a NDA that states (paragraph 8.1):
"BUYER agrees that SELLER'S drawings and data, processes, reports, technical data, detailed drawings, internal photographs and specifications, know how, technical information and other information furnished under this Agreement are confidential and shall be treated as confidential by BUYER and its employees, as Agents and Representatives."

The LLB09010B device is permanently sealed. Opening the MTU cannot be performed without cutting the sealed unit, resulting in PCB fracture and dislodging of ICs along with other components.

The above listed materials are confidential and are not available to the public or end user.

Sincerely,

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