

Nov. 21, 2011
ACLARA RF SYSTEMS
Former HEXAGRAM, Inc.
30400 Solon Road.
Solon, OH 44139
440-528-7200

Federal Communications Commission
Office of Engineering and Technology
Equipment Approval Services
RE : Request for Confidentiality
Attached Form 731 – Application FCC ID: LLB10004S

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
LLB10004S Schematic.pdf		Two pages
LLB10004S Bill of Materials.pdf,		Two pages
LLB10004S Block Diagram.pdf,		One page
LLB10004S Operational Description.pdf,		One page

Aclara and its customers have a Master Agreement that states (paragraph 13):

“Purchaser agrees that ACLARA’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 Purchaser and its employees, as Agents and Representatives.”

The LLB10004S device is permanently sealed. Sealing procedure is included. Opening the MTU cannot be performed without cutting the sealed unit, resulting in PCB fracture and dislodging of ICs along with other components. This will result in product failure.

The indicators of destruction caused by opening the enclosure are visual. The seal that forms is sufficiently strong to prevent the seal being broken by hand; mechanical means (band saw, hot knife, etc.) are typical necessary.

Any attempt made to destroy the sealing and view the contents would cause destruction and the device would not operate in the environment if it were to be opened.

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

Sincerely,



Larry Murphy
Executive Director of Engineering
440-528-7200
LMurphy@aclara.com