



HARRIS CORPORATION

600 Maryland Avenue, S.W.
Suite 850E
Washington, D.C. 20024
phone 1-202-729-3700
fax 1-202-729-3735

www.harris.com

April 28, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Final Request for Confidentiality of Harris Corporation for FCC ID No.
NK73092523 (FCC Correspondence Number 39487)**

Dear Ms. Dortch:

Harris Corporation (“Harris”) submits this revised, post grant request for confidentiality. Public disclosure of certain materials included in the above referenced equipment authorization application could reasonably put public safety officials at risk, jeopardize the integrity and value of investigative techniques and procedures, reveal Harris trade secrets due to the nature of the equipment, and harm Harris’ competitive interests. Harris respectfully requests, pursuant to 47 C.F.R. § 0.457(g), 47 C.F.R. § 0.457(d), and 47 C.F.R. § 0.459, that certain documents be held as confidential and withheld from public inspection or be superseded in the Commission’s equipment authorization system by subsequently filed versions. Exhibit A, Exhibit B, and Exhibit C provides listings of Harris’ requested treatment of exhibits, cover letters and correspondence.

- Exhibit A- Harris respectfully requests that these documents be treated as confidential and withheld from public inspection.
- Exhibit B- Harris respectfully requests that these documents be superseded in the Commission’s equipment authorization system because the materials have been subsequently replaced with a revised version.
- Exhibit C- The following documents may be made publicly available without any restrictions.

1. Confidentiality Compliance with 47 C.F.R. § 0.457(g)

Section 0.457(g)(5) and (6) of the Commission’s rules—pursuant to 5 U.S.C. § 552(b)(7)(E) and (F)—provides confidentiality if the production of records would either “disclose law enforcement investigative techniques or procedures,” or “endanger the life or physical safety of public law enforcement.” The product FCC ID No. NK73092523 is intended for use by federal, state, and local public safety entities. The nature of the product make it necessary for the descriptions provided in the equipment authorization application and supporting documents/exhibits— including technical information regarding the performance parameters, design and operation of the technology, and information regarding the identity of the entities proposing to use the product—be withheld from public disclosure and treated as



confidential under Section 0.457(g) of the Commission's rules. A complete list of documents that Harris respectfully requests be treated as confidential and withheld from public inspection is provided in Exhibit A.

To further support Harris' request for confidentiality and to underscore the need for confidentiality, Harris requests that the Commission condition its equipment authorization application as stated below:

Requested Equipment Authorization Conditions:

- (1) *The marketing and sale of these devices shall be limited to federal/state/local public safety and law enforcement officials only; and*
- (2) *State and local law enforcement agencies must advance coordinate with the FBI the acquisition and use of the equipment authorized under this authorization.*

These conditions are respectfully requested to ensure that the product associated with FCC ID No. NK73092523 is limited to its intended use, operated only by federal, state, and local public safety officials, and to prevent and address concerns regarding the proliferation of the equipment to unauthorized users.

Providing confidential treatment of the materials included with the equipment authorization application identified as FCC ID No. NK73092523 would be in compliance with Section 0.457(g) of the Commission's rules—specifically 47 C.F.R. § 0.457(g)(5) and (6). It is crucial to the protection of public safety officials that all materials identified in Exhibit A be treated as confidential and withheld from public inspection.

2. Confidentiality Compliance with 47 C.F.R. § 0.457(d).

Likewise, Section 0.457(d) of the Commission's rules provides that trade secrets may not be routinely made available for public inspection. Harris competes with a number of companies that are developing and marketing similar public safety devices. Harris is careful in protecting proprietary aspects of its equipment design and manufacturing processes due to the sensitive nature of the product. The information for which confidential treatment is sought has been kept confidential from public disclosure by Harris and has not been made available to third parties without the execution of non-disclosure agreements.

Disclosure of the technical information disclosed in the attached documents to competitors could compromise Harris' ability to develop and protect this technology as other companies could reverse engineer products using the information provided as part of the equipment authorization application. Moreover, disclosure of technical content would relinquish valuable proprietary information about the technologies Harris has developed and its manufacturing processes. Disclosure would also offer competitors additional unwarranted insight into the state of Harris' product development, thereby allowing competitors an advantage that would otherwise be unavailable to Harris. Therefore, in furtherance of Section 0.457(d) of the Commission's rules, Harris respectfully requests that all materials identified in Exhibit A be treated as confidential and withheld from public inspection.



3. Confidentiality Compliance with 47 C.F.R. § 0.459(b).

Pursuant to Section 0.459(b)(1-9) of the Commission's rules, Harris provides the following information in support of its request for confidentiality:

- (1) The information disclosed in the attached equipment authorization application includes highly confidential and proprietary technical information about the equipment design and operating characteristics. Harris respectfully request that the attached equipment authorization application, in its entirety, and all supporting materials identified in Exhibit A be withheld from public inspection.
- (2) The Commission proceeding by which the information is submitted is identified as—FCC ID No. NK73092523.
- (3) Disclosure of the technical information disclosed in the application to competitors could compromise Harris' ability to sell and continue to develop the product line. Public disclosure of the information in the attached documents would provide other companies the opportunity could reverse engineer the communications technology.
- (4) There are many competitors that produce similar public safety equipment. Thus, any disclosure of Harris technical information regarding this product would relinquish valuable proprietary information about the how the technology was developed and the manufacturing process. Disclosure would also offer competitors additional unwarranted insight into the state of Harris' product development, thereby allowing competitors an advantage that would otherwise be unavailable to Harris.
- (5) Disclosure would result in substantial competitive harm to Harris. Disclosure would offer competitors insight into Harris' product development process and provide competitors a competitive advantage in the market.
- (6) Harris is careful in protecting proprietary aspects of its equipment design and manufacturing processes. The information for which confidential treatment is sought has been kept confidential from public disclosure by Harris throughout development. It has only been made available to third parties pursuant to non-disclosure agreements.
- (7) None of the technical information included in the attached equipment authorization application has been made available to the public. Information revealed to third parties was made pursuant to non-disclosure agreements.
- (8) Harris requests that this information be withheld from public disclosure until and unless Harris notifies the Commission that such information may be publicly released. This equipment is designed for use by authorized users only and may be used for more than a decade in some cases. Moreover the equipment will be used by federal, state, and local public safety officials, thus, it is important that its design and operational details not be made available to unauthorized persons who might attempt to use knowledge of such details to compromise the applications for which the equipment will be employed.



- (9) Confidential treatment of the information contained in the attached equipment authorization application allows Harris to provide a full technical description of the equipment. However, refusal to treat such documents as confidential would result in submission of insufficient information on which the Commission could base its decision and delay deployment of these new and improved public safety devices.

For the foregoing reasons, Harris respectfully requests that the Commission treat the attached equipment authorization application and supporting materials as confidential and withhold them from public inspection. If Harris' request for confidentiality is found to be incomplete, Harris respectfully requests the Commission notify Harris of any deficiencies and provide Harris reasonable time to provide additional information. Should Harris' request for confidentiality be denied, Harris respectfully requests that the Commission return all materials to which confidentiality cannot be provided.

Respectfully submitted,

/s/

Tania W. Hanna, Esq.
Vice President, Legislative Affairs and Public Policy
Harris Corporation
600 Maryland Avenue, S.W.
Suite 850E
Washington, D.C. 20024
E-mail: thanna@harris.com
Phone: (202) 729-3712

Evan S. Morris, Esq.
Counsel, Government Relations
Harris Corporation
600 Maryland Avenue, S.W.
Suite 850E
Washington, D.C. 20024
Email: evan.morris@harris.com
Phone: (202) 729-3702



Exhibit A

Harris respectfully requests that these documents be treated as confidential and withheld from public inspection.



Exhibit Type	File Description	Correspondence Number	Date Submitted	Action Requested
Block Diagram	Revised Block Diagram	38994	2010-07-02 11:09:44.136	Hold as Confidential
Cover Letter	Request for Condition	N/A	2010-05-07 14:33:21.386	Hold as Confidential
Cover Letter	Confidential Response to Correspondence	38839	2010-05-20 16:30:07.423	Hold as Confidential
Cover Letter	Confidential Amendment to Technical Specifications	N/A	2010-05-20 16:30:09.213	Hold as Confidential
Cover Letter	Correspondence Response with Confidential Attachments	38878	2010-06-09 10:35:49.446	Hold as Confidential
Cover Letter	Response to Correspondence 38994 Revised Block Diagram Confidential	38994	2010-07-02 11:09:55.78	Hold as Confidential
Cover Letter	Response to FCC Correspondence 38958 with Confidential Attachments	38958 ¹	2010-07-02 17:04:55.616	Hold as Confidential
Cover Letter	Intended Use and Operational Description Clarification- Confidential	N/A	2010-07-15 09:56:11.573	Hold as Confidential
External Photos	Bottom View	N/A	2010-05-04 11:11:43.586	Hold as Confidential
External Photos	Left View	N/A	2010-05-04 11:11:59.78	Hold as Confidential
External Photos	Rear View	N/A	2010-05-04 11:12:07.403	Hold as Confidential
External Photos	Right	N/A	2010-05-04 11:16:55.186	Hold as Confidential
External Photos	Top	N/A	2010-05-04 11:17:03.656	Hold as Confidential

¹ Correspondence Reference Number 38957 was e-mailed to Harris Corporation on June 21, 2010, however it was superseded by Correspondence Reference Number 38958, which is referenced in the chart above.



Exhibit Type	File Description	Correspondence Number	Date Submitted	Action Requested
External Photos	Front View	N/A	2010-05-04 11:11:52.1	Hold as Confidential
Internal Photos	Backpane 01	N/A	2010-05-04 11:17:11.94	Hold as Confidential
Internal Photos	Backpane 02	N/A	2010-05-04 11:17:16.186	Hold as Confidential
Internal Photos	Backplane 3	N/A	2010-05-04 11:25:48.533	Hold as Confidential
Internal Photos	Backplane 4	N/A	2010-05-04 11:25:55.766	Hold as Confidential
Internal Photos	Backplane 5	N/A	2010-05-04 11:26:02.516	Hold as Confidential
Internal Photos	Backplane 6	N/A	2010-05-04 11:26:10.423	Hold as Confidential
Internal Photos	Backplane 7	N/A	2010-05-04 11:26:15.63	Hold as Confidential
Internal Photos	Card Cage	N/A	2010-05-04 11:26:19.663	Hold as Confidential
Internal Photos	Chassis Backplane	N/A	2010-05-04 11:26:26.246	Hold as Confidential
Internal Photos	Converter 1	N/A	2010-05-04 11:26:30.84	Hold as Confidential
Internal Photos	Converter 2	N/A	2010-05-04 11:26:36.09	Hold as Confidential
Internal Photos	Digital 1	N/A	2010-05-04 11:26:44.85	Hold as Confidential
Internal Photos	Digital 2	N/A	2010-05-04 11:26:55.903	Hold as Confidential
Internal Photos	Digital 3	N/A	2010-05-04 11:27:03.266	Hold as Confidential
Internal Photos	Digital 4	N/A	2010-05-04 11:27:09.073	Hold as Confidential
Internal Photos	PS01	N/A	2010-05-04 11:50:18.43	Hold as Confidential
Internal Photos	PS02	N/A	2010-05-04 11:50:26.7	Hold as Confidential



Exhibit Type	File Description	Correspondence Number	Date Submitted	Action Requested
Internal Photos	PS Fan	N/A	2010-05-04 11:50:31.123	Hold as Confidential
Internal Photos	PS Label01	N/A	2010-05-04 11:50:36.75	Hold as Confidential
Internal Photos	PS Label02	N/A	2010-05-04 11:50:41.893	Hold as Confidential
Internal Photos	Rear View Cover Off	N/A	2010-05-04 11:50:48.846	Hold as Confidential
Internal Photos	RF01	N/A	2010-05-04 11:50:54.916	Hold as Confidential
Internal Photos	RF02	N/A	2010-05-04 11:51:02.853	Hold as Confidential
Internal Photos	RF03	N/A	2010-05-04 11:51:13.023	Hold as Confidential
Internal Photos	RFIF	N/A	2010-05-04 11:51:18.7	Hold as Confidential
Internal Photos	RFD01	N/A	2010-05-04 11:51:24.01	Hold as Confidential
Internal Photos	RFD02	N/A	2010-05-04 11:51:29.016	Hold as Confidential
Internal Photos	RFD03	N/A	2010-05-04 11:51:32.356	Hold as Confidential
Internal Photos	SDR01	N/A	2010-05-04 12:19:25.123	Hold as Confidential
Internal Photos	SDR03	N/A	2010-05-04 12:19:41.686	Hold as Confidential
Internal Photos	SDR04	N/A	2010-05-04 12:19:47.336	Hold as Confidential
Internal Photos	SR Enclosure	N/A	2010-05-04 12:19:52.853	Hold as Confidential
Internal Photos	Top View Cover 02	N/A	2010-05-04 12:20:06.703	Hold as Confidential
Internal Photos	Top View Cover 03	N/A	2010-05-04 12:20:12.946	Hold as Confidential
Internal Photos	Top View Cover 04	N/A	2010-05-04 12:20:20.776	Hold as Confidential



Exhibit Type	File Description	Correspondence Number	Date Submitted	Action Requested
Internal Photos	Top View Cover 05	N/A	2010-05-04 12:20:28.183	Hold as Confidential
Internal Photos	Top View Cover 06	N/A	2010-05-04 12:20:36.553	Hold as Confidential
Internal Photos	Top View Cover	N/A	2010-05-04 12:20:42.993	Hold as Confidential
Internal Photos	SDR02	N/A	2010-05-04 12:19:32.19	Hold as Confidential
Internal Photos	Top View Cover 01	N/A	2010-05-04 12:20:00.28	Hold as Confidential
Operational Description	Operational Description	N/A	2010-05-04 10:55:04.32	Hold as Confidential
Operational Description	Intended Use Slideshow Correspondence 38958	N/A	2010-07-13 16:44:49.206	Hold as Confidential
Parts List/Tune Up Info	Chassis BackPlane Parts List	N/A	2010-05-04 10:54:52.76	Hold as Confidential
Parts List/Tune Up Info	Chassis Power Supply Parts List	N/A	2010-05-04 10:54:53.48	Hold as Confidential
Parts List/Tune Up Info	Chassis RFD Parts List	N/A	2010-05-04 10:54:54.616	Hold as Confidential
Parts List/Tune Up Info	SDR Converter Parts List	N/A	2010-05-04 10:54:55.426	Hold as Confidential
Parts List/Tune Up Info	SDR Digital Parts List	N/A	2010-05-04 10:54:56.313	Hold as Confidential
Parts List/Tune Up Info	SDR RFIF Parts List	N/A	2010-05-04 10:54:57.086	Hold as Confidential
Schematics	Back Plane Schematics	N/A	2010-05-04 10:55:10.386	Hold as Confidential
Schematics	Converter Schematics	N/A	2010-05-04 11:11:13.94	Hold as Confidential
Schematics	Digital Schematics	N/A	2010-05-04 11:11:15.96	Hold as Confidential
Schematics	Power Supply Schematics	N/A	2010-05-04 11:11:17.453	Hold as Confidential
Schematics	RFD Schematics	N/A	2010-05-04 11:11:26.266	Hold as Confidential



Exhibit Type	File Description	Correspondence Number	Date Submitted	Action Requested
Schematics	RFIF Schematics	N/A	2010-05-04 11:11:32.196	Hold as Confidential
Test Setup Photos	Powerline Conducted Emissions with Converter	N/A	2010-05-04 11:11:33.136	Hold as Confidential
Test Setup Photos	Powerline Conducted Emissions	N/A	2010-05-04 11:11:33.923	Hold as Confidential
Test Setup Photos	Radiated Emissions Test with Converter	N/A	2010-05-04 11:11:34.766	Hold as Confidential
Test Setup Photos	Radiated Emissions Test	N/A	2010-05-04 11:11:35.653	Hold as Confidential
Users Manual	Operators Manual	N/A	2010-05-04 10:55:04.09	Hold as Confidential



Exhibit B

Harris respectfully requests that these documents be superseded in the Commission's equipment authorization system because the materials have been subsequently replaced with a revised version.



Exhibit Type	File Description	Correspondence Number	Date Submitted	Action Requested
Cover Letter	Revised Request for Confidentiality	N/A	2010-11-04 11:40:58.5	Superseded by document listed in Exhibit A
Cover Letter	Correspondence Routing	N/A	2010-06-22 14:57:45.176	Superseded by document listed in Exhibit C
Cover Letter	Response to Correspondence 39039 Confidential	39039	2010-07-26 17:30:52.533	Superseded by document listed in Exhibit C
Block Diagram	Block Diagram	N/A	2010-05-04 10:54:52.073	Superseded by document listed in Exhibit A
Cover Letter	Request for Confidentiality	N/A	2010-05-04 10:54:49.626	Superseded by document listed in Exhibit A
Cover Letter	Request for Alternate Method of Positively Identifying Equipment	38829	2010-05-14 16:27:26.24	Superseded by document listed in Exhibit C
Cover Letter	Revised Request for Confidentiality	N/A	2010-10-12 18:18:16.02	Superseded by document listed in Exhibit A
ID Label/Location Info	Amended ID Label Correspondence 38997	38997	2010-07-14 12:00:32.273	Superseded by document listed in Exhibit C



Exhibit Type	File Description	Correspondence Number	Date Submitted	Action Requested
ID Label/Location Info	Revised ID Label	39268	2010-11-09 10:44:34.22	Superseded by document in Exhibit C
ID Label/Location Info	Manual Cover Notification	N/A	2010-05-14 16:31:07.676	Superseded by document in Exhibit C
ID Label/Location Info	Manual Table of Contents Notification	N/A	2010-05-14 16:31:08.106	Superseded by document in Exhibit C
ID Label/Location Info	Manual Notification	N/A	2010-05-14 16:31:08.493	Superseded by document in Exhibit C
RF Exposure Info	RF Exposure Info 850MHz	N/A	2010-05-18 16:39:00.5	Superseded by document in Exhibit C
RF Exposure Info	RF Exposure Info 1900MHz	N/A	2010-05-18 16:39:01.023	Superseded by document in Exhibit C
Test Report	Test Report 1 of 2	N/A	2010-05-04 10:55:06.636	Superseded by document in Exhibit C
Test Report	Test Report 2 of 2	N/A	2010-05-04 10:55:08.646	Superseded by document in Exhibit C
Users Manual	Users Manual Updated with FCC ID Notifications	38829	2010-05-14 16:40:21.086	Superseded by document in Exhibit A
Cover Letter	Final Revised Request for Confidentiality	39487	2011-03-14	Superseded by document in Exhibit C
Cover Letter	Final Request for Confidentiality	39487	2011-03-21	Superseded by document in Exhibit C



Exhibit C

The following documents may be made publicly available without any restrictions.



Exhibit Type	File Description	Correspondence Number	Date Submitted	Action Requested
Cover Letter	Revised Correspondence Routing	39487	2011-03-14 11:36:29.75	None
Cover Letter	Revised Response to Correspondence 39039	39487	2011-03-14 11:36:29.173	None
ID Label/Location Info	Revised ID Label	39487	2011-03-14 11:36:28.503	None
RF Exposure Info	Revised RF Exposure 850MHz	39487	2011-03-14 11:36:27.543	None
RF Exposure Info	Revised RF Exposure 1900MHz	39487	2011-03-14 11:36:28.086	None
Test Report	Revised Test Report 1 of 2	39487	2011-03-14 11:36:18.18	None
Test Report	Revised Test Report 2 of 2	39487	2011-03-14 11:36:26.006	None
Cover Letter	Final Request for Confidentiality	39487	2011-04-28	None