February 2, 1999

Mr. Greg Czumak
Equipment Authorization Branch
Federal Communications Commission
7435 Oakland Mills Rd.
Columbia, MD

      Re: Application of Raytheon Company dba Raytheon Systems Co.
            FCC ID: NMFAAGSM19500M
            Confidentiality Request

Dear Mr. Czumak:

This is in response to your email of February 1, 1999, pertaining to the confidentiality request submitted with the above referenced application. The request as submitted sought confidentiality for Exhibit 3 because that exhibit contains detailed drawings and electrical schematics that Raytheon Company dba Raytheon Systems Co. treats as confidential commercial information and which also contains trade secrets pertaining to the process of constructing the equipment. The information contained in the drawings would greatly assist a competitor in misappropriating our efforts in the design of the equipment covered by the application for approval. As such, we believe that this information is entitled to protection under Section 0.459 of the Commission's Rules. See also Section 0.457(d) of the Rules.

The photographs contained in Exhibit 9 also contain confidential commercial information and, if released, would disclose trade secrets that pertain to construction of the device. Significant effort and resources in research, development, and product design have been invested by Raytheon Company dba Raytheon Systems Co. and would be compromised if the materials for which confidentiality is requested were to be made available to competitors. Thus, while photographs would normally not be protected, these photographs, as opposed to the photographs in Exhibit 8, should be entitled to protection because they offer critical details as to the placement and design of certain elements of the antenna part of the product. This treatment would be consistent with the our previous request for confidentiality with a similar prior product approved under FCC ID number NMFAAGS1912501C1B approved in 1997.

Respectfully,

Paul Golemon
Raytheon Company dba Raytheon Systems Co.