

**VCom Inc.**  
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Date: 16 February 2005

Federal Communications Commission  
Authorization and Evaluation Division

Confidentiality Request regarding application for certification of VCom TRI1819  
Subscriber Transceiver, FCC ID: **OPPTRI1819**

Pursuant to Sections 0.457 and 0.459 of the Commission's Rules, we hereby request  
confidential treatment of information accompanying this application as outlined below:

**Schematic Diagrams, Block Diagrams, Parts Lists, and Factory Tuning Procedure**

We have requested that the information listed above required to be submitted with this  
application be withheld from public review.

**Reason for request:**

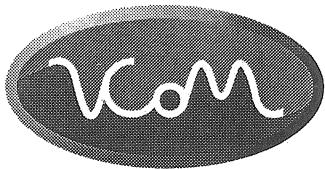
This information is a trade secret. VCom Inc. developed the TRI1819 product in response  
to commercial marketplace requirements. Its design and functional features are exclusive  
to VCom.

The TRI1819 product is offered in the highly competitive Point-to-Multi-Point Fixed  
Broadband Wireless service market. Technology in the field of wireless communications  
is evolving rapidly, and confidentiality of proprietary design information is essential to  
maintain competitiveness in this market. Disclosure of this information may allow  
competitors to benefit from VCom's intellectual property.

All employees of VCom Inc. are required to sign an Intellectual Property Agreement  
form upon becoming employed with VCom. This will identify the responsibility and  
rights of both VCom and the employee in regard to any interest or rights involved in the  
discoveries, inventions, improvements, etc. normally referred to as "Inventions" which  
are made by the employee during the course of his/her work.

All OEM manufacturing partners, as well as any visitors to the plant, are required to sign  
non-disclosure agreements prior to being granted access to production and  
research/development areas. Electronic originals of proprietary documents are password  
protected and hardcopies are controlled.

This information is not available to the public and there have been no disclosures to  
parties who are not employees of VCom with the exception of Bay Area Compliance Lab  
Corp., who is acting on our behalf as an agent to FCC.



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The period of time required for nondisclosure for the TRI1819 product is for the life of the product (typically 20 years) and beyond, since features of the current design may be incorporated in future VCom products. This period should therefore be 20 years.

The TRI1819 product cannot be readily reverse-engineered without the schematics and parts lists. The TRI1819 incorporates proprietary software embedded in its circuits that is essential for its operation.

The TRI1819 is not sold directly to the general public; it is sold only to known, approved customers after credit check. No units are sold to known or potential competitors where there may be a possibility of reverse engineering. The TRI1819 requires professional installation.

The applicant understands that pursuant to Section 0.457 of the Rules, disclosure of this application and all accompanying documentation will not be made before the date of the Grant for this application.

Please contact me if there is any additional information you may need.

Sincerely,

Darryl Wurtz, Quality Assurance Manager

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