

October 27, 2005

Federal Communications Commission Equipment Approval Services P.O. Box 358315 Pittsburgh, PA 15251-5315

Subject: Request for withholding from public disclosure the schematics, block diagrams, and operational description pursuant to an application for certification

Gentlemen:

We, Pentair Water Pool and Spa, Inc., would like to request that all schematics, block diagrams, and operational descriptions submitted with the application for certification be withheld from public disclosure as per Section 0.459 of FCC Rules.

This request is made under the provisions of Section 0.457 (d) of the Commission's Rules, and Section 552 (b)(4) of the Freedom of Information Act. These sections authorize the withholding from public inspection, those materials which would be privileged as a matter of law if retained by the person submitting them, and materials which would not customarily be released to the public by that person.

If you have any questions, please do not hesitate to contact Ed Brown at 1-800-445-1397 ext. 360.

Sincerely

Robert D. Miller

Vice President, Finance/IT