

Federal Communications Commission  
Equipment Authorization  
7435 Oakland Mills Road  
Columbia, MD 21046

April 3rd 2001

**Re : Request confidential Treatment, FCC ID PGPOIS-W-WR300303**

Dear Sirs

Baumer Electric requests that the material in the schematics and Operational description by the application of PGPOISW-WR300-303 should be withheld from public disclosure in accordance with section 0.459 of the commissions Rules, 47 C.F.R. 0.459.

- 1) The following material should be treated confidentially : schematics, internal photos and block diagrams.
- 2) The proceeding is that involving the application for equipment authorization (certification) under FCC ID No PGPOIS-W-WR300303. Note that a second application under FCC ID No PGPOIS-W-W300303 has been submitted due to a request of the FCC but has not been pursued and therefore will be dismissed (see also other cover letter).
- 3) The submitted material contains a detailed theory of operation and coding principle of the transponder IC. It contains patented firmware information and is therefore confidential business information.
- 4) This identification system is an innovative approach using a new technology based on surface acoustic waves and appropriate reader technology/signal processing. Identification for access, logistics and manufacturing control is a highly competitive area. Any technological information can lead to a substantial advantage over competitors.
- 5) Disclosure will give away several years of research and development efforts and will allow competitors unwarranted insight into the state of the product allowing them an advantage not available to Baumer.
- 6) The information for confidential treatment is sought is kept confidential by Baumer and not made available to third parties.
- 7) The only information which was available to the public was those described in the users manual, data sheets and brochures.
- 8) This material should not be disclosed for at least 10 years. While improvements in design are made relatively frequently design principles and manufacturing techniques will have a competitive value for years to come. Additionally this equipment will be used in access and security applications where information about data transmission and coding should not be made public to unauthorized persons.

Kind regards

Reto Peter

Development Manager  
Identification systems  
Baumer Electric