



# ROGERS LABS, INC.

4405 West 259<sup>th</sup> Terrace  
Louisburg, KS 66053  
Phone / Fax (913) 837-3214

April 17, 2001

Timco Engineering Inc.  
849 NW State Road 45  
Newberry, FL 32669  
Telephone 888.472.2424  
Fax 352.472.2030

Applicant: NEVCO Scoreboard Company  
301 East Harris Avenue  
Greenville, Illinois 62246  
Telephone 618.664.0360  
Fax 618.664.0367

Mary Gayle Nevinger  
President

Equipment: FCC ID: PLH-ZW1

RE: Confidentiality for schematics

Gentlemen:

Lectrosonics Inc. requests that the material in the schematic diagrams be withheld from public disclosure in accordance with Section 0.459 of the Commissions Rules, 47 CFR 0.459, following the grant of certification. In support of this request, Lectrosonics Inc. submits the following:

**1. Identification of the specific information for which confidential treatment is sought:**

The materials set forth in the schematic diagrams which are those for which confidentiality is sought.

**2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:**

The proceeding is that involving the application for equipment authorization (certification) under FCC ID number PLH-ZW1.

**3. Explanation of the degree to which the information is commercial or financial, or contains trade secret or is privileged:**

This material includes a detailed schematic of the device. As such this material is treated as highly confidential business information.

**4. Explanation of the degree to which the information concerns a service that is subject to competition:**

The material for which confidentiality is sought is employed in the design and manufacture of wireless control systems transmitting equipment that is offered on a highly competitive basis. Customers for this equipment have a variety of competing sources.

**5. Explanation of how disclosure of this information could result in substantial competitive harm:**

Disclosure would, in effect, give away the fruits of the labors of the applicant's engineering department and personnel, who have designed the equipment and manufacturing process. Disclosure would also offer competitors additional unwarranted insight into the state of the product development, thereby allowing competitors an advantage, not available to the applicant.

**6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure:**

The information for which confidential treatment is sought is kept confidential by the applicant and not made available to third parties except following non-disclosure agreements.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:**

To the knowledge of those preparing this application, the information has not been disclosed publicly heretofore. While the general theory of operation of this equipment has been the subject of numerous disclosures in industry and standards groups as well as in the rule making proceedings of the FCC, the protection sought is narrowly drawn and pertains to certain specific implementations of the digital circuitry technology.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure:**

This material should not be disclosed for at least 25 years. While improvements in the design are made relatively frequently, disclosure of the design information would lead to insights into both design and manufacturing techniques that could have an adverse competitive effect for many years to come. This equipment is designed for commercial, industrial and governmental applications. As such, unlike most consumer equipment, this equipment will be used for more than a decade in some cases. As such, it is important that the design not be made available to unauthorized persons who might attempt to use knowledge of the design to compromise the applications for which the equipment will be employed.

**9. Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:**

See item 8 above. Note that the equipment for which approval is being sought will be employed in applications that inherently place a premium on security.

The special fee for request of confidentiality will be submitted with the application.

Should you require any further information, please contact the undersigned.

Thank you for your consideration in this matter.

Sincerely,

*Scot D Rogers*

Scot Rogers  
Rogers Labs, Inc.  
Enclosures