

7 September 2005

Federal Communications Commission  
Equipment Authorization Division  
Application Processing Branch  
7435 Oakland Mills Road  
Columbia, MD 21045



ERG  
TRANSIT SYSTEMS

Reference: FCC ID: Q47-MCROEM  
Subject: Request for Confidentiality for FCC Certification Application  
ERG Transit Systems  
Multiprotocol Card Reader - MCR - Low power transmitter (intentional radiator)

Pursuant to Rule 47 CFR, Chapter 1, Section 0.457(d)(1)(ii), ERG Transit Systems, requests that prior to the equipment authorization grant for the MCR, the entire application be classified and deemed confidential by the Federal Communications Commission (FCC) and as such be withheld from public inspection.

Pursuant to Rule 47 CFR, Chapter 1, Section 0.459, ERG Transit Systems requests post-grant confidentiality for the following items.

Exhibit - PCB Layouts	47 CFR 2.1033 Complete technical PCB Layouts
Exhibit - Schematics	47 CFR 2.1033 Complete technical schematic circuit diagrams
Exhibit - Operational Description	47 CFR 2.1033 Theory of operation of EUT
Block Diagram	47 CFR 2.1033

As per Rule 47 CFR, Chapter 1, Section 0.457(d)(2), the exhibits tendered for the purpose of this grant, contain details of trade secrets and technical data that is not made available to competitors and the general public. This information is treated in a confidential manner by ERG Transit Systems and guarded from disclosure to our competitors.

The exhibits outlined above are not routinely made available to ERG Transit Systems staff, with such access granted only to those specifically involved with this particular project. They contain information detailing the unique technology and circuitry of the product that would be of significant benefit to our competitors. All employees treat this technical data in a confidential manner.

The manufacture of this product has taken place after an extensive research and development process that has seen the company invest a considerable amount of time and money. The time and effort taken has enabled the product to meet the specific demands of the competitive market for which it is intended and it would be therefore detrimental to allow competitors easy access to design and development details.

Apart from a limited number of employees, the information has previously only been disclosed to the Test House responsible for conducting testing and authorized to act as our agent during the certification process.

Yours sincerely

Dr David Goudie  
Head of Technology