



Date: 12 November 2008

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia MD 21046

Subject: Certification Application

FCC ID:QWP49100

GRANTEE Code : QWP

FRN Number : 0008260564

It is requested that the following information is to be held confidential on behalf of Orthogon<sup>1</sup> Systems/Motorola.

Pursuant to the provisions of Sections 0.457 and 0.459 of the FCC Rules (47 CFR §§ 0.457, 0.459) Motorola requests that the Commission withholds indefinitely from public disclosure the following documents submitted as part of this application for certification.

- Block Diagrams
- Schematics
- Parts Lists/ Bills of Material
- Theory of Operation

### **Justification**

1. Motorola Inc. which now owns the Orthogon Systems business is proposing to market a product known as Motorola PTP49600 as a Wireless Ethernet Bridge operating at 4940-4990MHz. This is a highly competitive market where Motorola believes its product will have significant performance advantage in terms of its operation in Non Line-of-Sight conditions. The materials listed above identify the methods used in the product to achieve the performance advantage and contain significant Intellectual Property developed by Motorola. The publication of some or all of the information could allow this performance advantage to be unfairly eroded by the competitors of Motorola.
2. Motorola has entered into non-disclosure agreements during the development process with some of its key component suppliers. Publication of schematics and Bills of Material would compromise those agreements.

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<sup>1</sup> Orthogon Systems was the trading name of PipingHot Networks Ltd. PipingHot Networks is now a wholly owned subsidiary of Motorola, Inc. This submission is made by Orthogon Systems as the holder of the Grantee Code applicable to this application.



**MOTOROLA**

3. Motorola has taken steps during development of the product to keep confidential its plans:
  - a. The Motorola web site was only upgraded to give brief details of the product once the formal launch date was finalised.
  - b. Technical papers produced by Motorola do not identify how the performance advantage is achieved
  - c. Prior disclosure to 3<sup>rd</sup> parties has always been under the terms of specific non-disclosure agreement.
4. Motorola believes that no benefit would accrue to the general public in the event of publication of the material listed. The only beneficiaries would be the competitors of Motorola.
5. Motorola believes that the material listed should be kept confidential for a period of 5 years from the date of submission in order to prevent its competitors from copying its technology.

**Yours Sincerely**

A handwritten signature in blue ink, appearing to read 'Clem Fisher'.

**Clem Fisher**  
**RF Development Manager**  
**Motorola Point to Point Fixed Wireless Solutions Group**