



Federal Communications Commission
Authorization and Evaluation Division

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Subject: Confidentiality Request for FCC ID: QZC-REXU

Pursuant to FCC 47 CRF 0.457(d) and 0.459 and IC RSP-100, Section 10, the applicant requests that a part of the subject FCC/IC application be held confidential.

Type of Confidentiality Requested		Exhibit
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Block Diagrams
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Operation Description/Theory of Operation

Elster Solutions has spent substantial effort in developing this product and it is one of the first of its kind in industry. Having the subject information easily available to "competition" would negate the advantage they have achieved by developing this product. Not protecting the details of the design will result in financial hardship.

Elster Solutions requests permanent confidentiality for the block diagram because it describes in detail how we chose to distribute system gain and where we locate filtering, both of which are important keys to how we achieve our system performance. Making this information available to our competition would unfairly undermine any competitive advantage we may have. Elster Solutions requests permanent confidentiality for the Operation Description because it contains such sensitive information as our pseudorandom hopping sequence, channel selection and network architecture which is proprietary.

Respectfully,

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