

KILPATRICK LLC

102 S. Tejon Street
Suite 1100
Colorado Springs, Colorado 80903

Federal Communication Commission
Laboratory Division
7435 Oakland Mills Road
Columbia, MD 21046

RE: Confidentiality Treatment Request for Equipment Authorization for FCC IDs S2F-5830, S2F-6740 and S2F-7650

Dear FCC:

KILPATRICK LLC and its affiliates ("KILPATRICK") seek confidential treatment of certain materials and information we are providing with our submission for an equipment authorization for the product with the FCC ID of S2F-5830, S2F-6740 and S2F-7650.

Short Term Confidential Treatment

As permitted under the FCC's Public Notice of June 15, 2004 (DA 04-1705) and to comply with the marketing regulations under 47 CFR Section 2.803 and importation rules under 47 CFR Section 2.1204, we request the following information be kept confidential for 180 days from the date we submit our equipment authorization for each of the above product applications:

1. Set-up pictures for SAR and radiated tests for each product
2. Internal and external pictures of each product
3. The user manual for each product

We request confidential treatment of this information because we do not share this information with anyone else except under written confidentiality agreements to help ensure the third party agrees to protect this information as KILPATRICK'S confidential information. Exposure of this non-public information in advance of KILPATRICK's announcement and sale of this product to the public would give others a competitive advantage over KILPATRICK and this product and result in a detrimental impact to KILPATRICK's business.

Long Term Confidentiality Treatment

As permitted under 47 CFR Section 0.457 and 47 CFR Section 0.459 and related rules of the FCC, we request the following information be kept confidential on an indefinite basis from the date we submit our equipment authorization for each of the above product applications:

1. Block diagram for each product
2. Operational manual/descriptions (including for power reduction) for each product
3. Schematics for each product
4. Tune-up procedures for each product

These particular materials contain highly confidential information about the technical design and interworkings of this KILPATRICK product. Specifically, anyone having access to this information would be able to understand how KILPATRICK designs this product. Like the other information, KILPATRICK only shares this with external parties under non-disclosure agreements. KILPATRICK also follows even more strict disclosure standards given the sensitivity of this information so that only those who genuinely need to know this information would have access. Further, unlike KILPATRICK's user guides and

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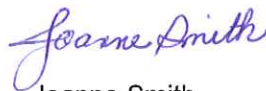
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product images that are made publicly available, KILPATRICK keeps the block diagrams, operational descriptions and schematics confidential even after KILPATRICK ships its products. This

product will be made available in the highly competitive consumer market for mobile devices. Any public disclosure would be detrimental to KILPATRICK's business by giving KILPATRICK's competitors unprecedented access and knowledge to our technical specifications which would give them an unfair commercial advantage over KILPATRICK and its products and those competitors would unjustly gain knowledge based on all of our trial and error, time, resources and money KILPATRICK has expended in determining the best way to design and manufacture the KILPATRICK products.

If there are questions or concerns with this request, please contact me to discuss.

Warm regards,



Joanne Smith
President
KILPATRICK LLC