



May 13, 2011

Federal Communications Commission
Office of Engineering and Technology
Equipment Authorization Division
7345 Oakland Mills Road
Columbia, MD 21046

Re: FCC Form 731 Application for Class II Permissive Change – Confidentiality Request FCC ID:
SM6-MINODE-WATER

To Whom It May Concern:

Pursuant to the provision of 47 C.F.R. §§ 0.457(d) and 0.459 and IC RSP-100, Section 10, Mueller Systems, LLC (“Mueller Systems”) requests the following exhibits that are a part of the subject FCC application be held permanently withheld from public review as permitted by the FCC rules:

- Theory_of_OpS for FCC3.0 MiNet RF products

Mueller Systems has spent substantial effort in developing this product. Having the subject information easily available to “competition” would negate the advantage it has achieved by developing this product. Additionally, the application contains specific technical information which Mueller Systems considers to be trade secrets and proprietary confidential information which, if disclosed, could be used to the disadvantage of the applicant in the market place.

Accordingly, these exhibits and confidential information contained in them are exempt from disclosure under the Freedom of Information Act, Section 552(b) (4) of Title 5 of the United States Code. If any person or entity should request copies of these exhibits or any portion of them, Mueller Systems asks that such request be provided to me, as provided for in Executive Order 12600.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink that reads "Clayton Robert Barker III". The signature is written in a cursive style with a prominent "C" and "B".

Clayton Robert Barker III
Executive Vice President & General Counsel