

Applicant:  
LIGOWAVE LLC  
1440 Dutch Valley Place, Suite 1155  
Atlanta, GA 30324

**Re: Confidentiality for submittal information regarding FCC ID number V2V-PTP3-R2**

**PRODUCT:**

Broadband wireless internet access point transmitter operating under part 15.247 & part 90Z

Dear Sirs:

LIGOWAVE LLC requests that the material in the Schematic, block diagram, and Operational Description is withheld from public disclosure in accordance with Section 0.459 of the Commissions Rules, 47 C.F.R., following grant of the application. In support of this request, LIGOWAVE LLC submits the following:

**Long Term Confidential Files Include**

Schematics	File Name	Conf Schem PTP3-R2.pdf
Block diagram	File Name	Conf BlkDia PTP3-R2.pdf
Operational Description	File Name	Conf OpDes PTP3-R2.pdf
Internal Photos	File Name	IntPho PTP3-R2.pdf

**Short Term Confidential files include**

External Photos	File Name	ExtPho PTP3-R2.pdf
Internal Photos	File Name	IntPho PTP3-R2.pdf
Test Setup Photos	File Name	TSup PTP3-R2.pdf
User Manual	File Name	UserMan PTP3-R2.pdf

**1. Identification of the specific information for which confidential treatment is sought:**

The materials set forth in the Operational Description, block diagram, Schematics, and Internal Photos, which are segregated from the non-confidential exhibits of the application, are those for which confidentiality is sought.

**2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:**

The proceeding is that involving the application for equipment authorization (certification) under FCC ID No: V2V-PTP3-R2

**3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:**

This material includes a detailed theory of operation, circuit diagrams, (schematic diagrams), internal photos and any detail Parts List. As such, this material is treated as highly confidential business information.

**4. Explanation of the degree to which the information concerns a service that is subject to competition:**

The material for which confidentiality is sought is employed in the design and manufacture of this transmitting equipment that is offered on a highly competitive basis. Customers for this equipment have a variety of competing sources.

**5. Explanation of how disclosure of the information could result in substantial competitive harm:**

Disclosure would, in effect, give away the fruits of the labors of Ligowave LLC's engineering personnel, who have designed the equipment and the manufacturing process. Disclosure would also offer competitors additional unwarranted insight into the state of the product development, thereby allowing competitors an advantage, not available to LIGOWAVE LLC

**6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure:**

The information for which confidential treatment is sought is kept confidential by LIGOWAVE LLC and not made available to third parties except pursuant to non-disclosure agreements.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:**

To the knowledge of those preparing this application, the information has not been disclosed publicly heretofore. While the general theory of operation of this equipment has been the subject of numerous disclosures in industry and standards groups as well as in rule making proceedings of the FCC, the protection sought is narrowly drawn and pertains to certain specific implementations of this radio technology.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure:**

This material should not be disclosed for at least 25 years. While improvements in design are made relatively frequently, disclosure of the design information would lead to insights into both design and manufacturing techniques that could have an adverse competitive effect for many years to come. This equipment is designed for commercial, industrial, and governmental applications. As such, unlike most consumer equipment, this equipment could be used for more than a decade in some cases. As such, it is important that the design not be made available to unauthorized persons who might attempt to use knowledge of the design to compromise the applications for which the equipment will be employed.

Should you require any further information, please contact the undersigned.

Thank you for your consideration in this matter.

Sincerely,



Matt Hardy