

**Glen Ellen Laboratories**

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Glen Ellen, CA 95442

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September 5, 2009

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

Subject: Confidentiality for submittal FCC ID: WZK-PR-1000

Applicant:

Invention Planet, LLC  
3535 Industrial Drive, Suite A4  
Santa Rosa, CA 95403  
707 544 6096  
707 280 1134  
707 829 0412 fax

Subject: Confidentiality for submittal FCC ID: WZK-PR-1000

Dear Sir or Madam,

The following materials are requested to be permanently withheld from public inspection as per Section 0.459 of the FCC Rules, 47 C.F.R. 0.459 (1998).

- Schematics
- Theory of Operation
- Block Diagram

The details as requested in 47 C.F.R. 0.459 are as follow:

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

The specific information requested to be held confidential are: Schematics, Theory of Operation, and Block Diagram.

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

The information was submitted to the Commission under the proceeding involving the application for equipment authorization (certification) under FCC ID: WZK-PR-1000.

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

The materials listed are critical to the intellectual property of Invention Planet, LLC and are treated as highly confidential business information that kept as an internal company trade secret.

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

These materials are part of a new product that is being introduced into a highly competitive market with several established products already in place.

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

This critical design information would reveal the key new technology breakthroughs that have taken years to perfect and bring to market. Any disclosure would seriously harm the ability of the company to gain any advantage from this newly developed technology.

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

Invention Planet, LLC keeps confidential all of the information for which non-disclosure is sought. It is not made available to third parties except through 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:**

The information for which non-disclosure is being sought is very specific to this newly developed product and has not been made available to the public. The only disclosure of any of this information to a third party has been to the contract manufacturing firm through a non-disclosure agreement.

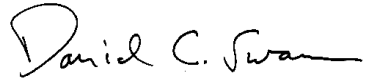
**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure:**

The information that is being sought for non-disclosure represents years of technology development that will be the framework for an entire new product line and the launch of a new company. It represents a revolutionary breakthrough in the way these types of products can be made. The expectation is that this new technology will be a critical underlying foundation for many future follow-on products. For these reasons, the request is for permanent confidentiality of this critical information.

For any further information, please contact the undersigned.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Daniel C. Swann". The signature is written in a cursive style with a large initial 'D' and a long horizontal flourish at the end.

Daniel C. Swann  
President, Glen Ellen Laboratories