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Federal Communications Commission
Authorization and Evaluation Division

Confidentiality Request regarding application for certification of FCC ID: Z2X4822X00CSL

Pursuant to Sections 0.457 and 0.459 of the Commission's Rules, we hereby request confidential treatment of information accompanying this application as outlined below:

Exhibit Type	File Name
Schematics	CONF Z2X4822X00CSL_Schem-1.pdf
	CONF Z2X4822X00CSL_Schem-2.pdf
	CONF Z2X4822X00CSL_Schem-3.pdf
	CONF Z2X4822X00CSL_Schem-4.pdf
	CONF Z2X4822X00CSL_Schem-5.pdf
Parts List	CONF Z2X4822X00CSL_PartsLst.pdf
Block diagrams	CONF Z2X4822X00CSL_BlockDia.Pdf
Internal Photos	CONF Z2X4822X00CSL_IntPho.Pdf
Users Manual	CONF Z2X4822X00CSL_UserMan.Pdf

To Whom It Concerns:

Smiths Detection appreciates the Federal Communications Commission (FCC)'s review of our application for Wi-Fi Certification for our radioisotope detector and identifier, the Radseeker™. As part of the FCC review and hopefully future certification, Smiths Detection is hereby requesting that certain information be maintained as confidential as a Smiths Detection trade secret. This confidential information should not be viewable on the FCC equipment authorization website. As provided for under Sections 0.457(d) and 0.459 of the FCC Rules, we provide the following information in support of our request associated with the Radseeker operator's manual.

Radseeker Operator's Manual:

The Radseeker is not a consumer product sold to the general public. This product is a radioisotope detector and identifier that will be used by technically sophisticated users typically either employed by or supporting governmental entities. Product is not available to the general public and is only serviceable by Smiths Detection personnel or licensed service providers who have been trained and authorized by Smiths Detection. The operator's manual for the Radseeker provides proprietary technical information about the operation of the system and system limitations that are critical for the end-user to properly utilize the system, but this information is proprietary to Smiths. Except for our customers who receive the manual under the terms and conditions (attached) of their order and the stated provisions in the manual itself (which is attached for reference), disclosure of the manual to other third parties would be done under a mutually executed non-disclosure agreement (NDA) as stated in article 18. Furthermore, we further stress the confidentiality of information in the manual on page ii of the manual (also attached). The manual clearly has a statement about the proprietary nature of the information contained therein as shown in the attached. Lastly, the disclosure of the Radseeker manual could harm Smiths Detection's competitive position because of information on limitations and capabilities of the system and is protected by Smiths as a trade secret. Therefore, the manual is not publicly available and is only provided to non-customer third parties under proprietary information protection. The specific confidential information being requested to be protected is:

CONF Z2X4822X00CSL_UserMan.Pdf

Radseeker Internal Images:

As previously stated, the Radseeker is not a consumer product sold to the general public. This product is a radioisotope detector and identifier that will be used by technically sophisticated users typically either employed by or supporting governmental entities. Product is not available to the general public and is only serviceable by Smiths Detection personnel or licensed service providers who have been trained and authorized by Smiths Detection. These images are not publicly available and are only provided to third parties under a mutually executed non-disclosure agreement (NDA) as stated in article 18. In addition, the internal images of the system will provide proprietary technical information to the Radseeker that could harm Smiths Detection's competitive position and is therefore protected by Smiths as a trade secret. The specific confidential information being requested to be protected is:

CONF Z2X4822X00CSL_IntPho.Pdf

In addition to the provisions of Sections 0.457(d) and 0.459 of the FCC Rules, Smiths Detection believes that the above identified information would be protected from disclosure based on the commercial sensitive information exemption from public release under Exemption 4 to the FOIA, 5 U.S.C. § 552(b)(4) 2006. Exemption 4 protects "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." 5 U.S.C. § 552(b)(4). This exemption is intended to protect the interests of both the government and submitters of information. Specifically, the exemption affords protection to those submitters who either voluntarily or are required to furnish commercial or financial information to the government by safeguarding them from the competitive disadvantages that

could result from disclosure. Exemption 4 covers two broad categories of information in federal agency records: (1) trade secrets; and (2) information that is (a) commercial or financial, (b) obtained from a person, and (c) privileged or confidential. As previous described above, Smiths Detection considers the internal images and the operator's manual to be trade secrets; and therefore, the information should be properly by withheld from publicly disclosure, kept confidential, pursuant to Exemption 4, as Smiths' confidential commercial information, not customarily disclosed to the public and the disclosure of which would cause Smiths substantial competitive harm.

The above materials contain trade secrets and proprietary information not customarily released to the public. The public disclosure of these materials may be harmful to the applicant and provide unjustified benefits to its competitors.

The applicant understands that pursuant to Section 0.457 of the Rules, disclosure of this application and all accompanying documentation will not be made before the date of the Grant for this application.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie Mirabelli", written in a cursive style.

Stephanie Mirabelli, Product Manager

Enclosures (2)

*Enclosures: RadSeeker_CS-CL_Rev_A (Proprietary Statement)
US Sales Terms and Conditions November 2010 - NDA*