



Mobile and Wireless Systems Division

Federal Communications Commission
Equipment Approval Services
P.O. Box 358315
Pittsburgh, PA 15251-5315

Norman H. Nelson
Symbol Technologies, Inc.
2145 Hamilton Ave
San Jose, CA 95125-5905
Voice: (408) 369-2649
FAX: (408) 369-2740
norm@psd.symbol.com

Re: Certification Request for FCC ID: H9PLA3021-100

Date: July 19, 1999

To The Commission:

This certification request is for the Spectrum 24 model LA3021-100 PCMCIA WLAN Module. The LA3021 series of WLAN modules are an improved version of the current LA2400 and LA3020 modules. The LA3021 series operates in the same manner as the LA3020. Symbol Technologies, Inc. manufactures information systems that are employed in commercial establishments to assist in controlling inventory. Spectrum 24 is a Wireless Local Area Network (WLAN) used along with hand held computers to assist in information collection typically in retail stores, warehouses, and factories.

The following files are electronically submitted as attachments.

Exhibit Type	File Name	Confidential
Block Diagram	LA3021 BlkDia.pdf	X
Cover Letter:	LA3021-100 CvrLet.pdf	
External Pictures	LA3021-100 ExtPics.pdf	
ID Label/Location Info	LA3021-100 Label.pdf	
Internal Photos	LA3021-100 IntPics.pdf	
Operational Description	LA3021 OpDesc.pdf	X
Schematics	LA3021 Schem.pdf	X
Test Report	LA3021-100 TstRpt.pdf	
RF Exposure	LA3021-100 TstRptA.pdf	
Users Manual	LA3021 UsrMan.pdf	

Symbol Technologies, Inc. ("Symbol"), requests that the Block Diagram, Schematics, and Operational Description Exhibits of the above referenced application be withheld from routine availability for public inspection pursuant to Section 0.459 of the Commissions Rules and Freedom of Information Act ("FOIA") Exemption 4, 5 U.S.C. 552(b)(4).

These exhibits consist of "trade secrets [or] commercial or financial information obtained from a person and privileged or confidential", 5 U.S.C. 552(b)(4), and is therefore entitled to protection from disclosure under FOIA.

The documents in question contain trade secrets: detailed technical descriptions, specifications and schematics for a product to be offered for sale. These materials provide particulars on the product design that can be ascertained from inspection of the product itself only with extraordinary expenditures of time and effort, if at all. This information would give Symbol's would-be competitors an unearned and unwarranted competitive advantage.

Moreover, the documents contain "commercial information" within the scope of FOIA Exemption 4. This information is the product of Symbol's investment of money, personnel, and other resources. The result of that investment is a fairly earned position in the marketplace. Premature release of the information threatens substantial and unwarranted harm to Symbol's competitive position.

For these reasons, Symbol has taken pains to keep this technical information confidential, and intends to continue doing so. Symbol customarily withholds this information from persons outside the employ of Symbol and certain of its suppliers and contractors, and even within these groups routinely limits access to persons having a particular need for the information. If the Commission were to make these documents public, it would be giving away hard won fruits of Symbol's labors without compensation.

The filing fee required for this request is submitted by credit card account as entered on Form 159 mailed under separate cover.

If there are any questions about this request, please call me at the number above.

Thank you for your attention.

Respectfully submitted,

Norman H. Nelson