ROGERS LABS, INC.

4405 West 259th Terrace
Louisburg, KS 66053
913 837-3214

January 15, 2014

Timco Engineering Inc.
849 NW State Road 45
Newberry, FL 32669

Applicant: Garmin International, Inc.
1200 East 151st Street
Olathe, KS 66062

Re: Confidentiality for submittal information regarding FCC ID number IPH-02276

Product: Unlicensed Transmitter operated under paragraph 15C

Dear Sirs:
Garmin International, Inc. requests that the material in the **Schematics**, B**lock Diagram**, and **Operational Description** be withheld from public disclosure pursuant to Sections 0.457 and 0.459 of the Commission's Rules following grant of the application. In support of this request, Garmin International, Inc. submits the following information.

CONFIDENTIAL FILES
Conf BlkDia O4AHGQ00.pdf
Conf OpDes O4AHGQ00.pdf
Conf Schem O4AHGQ00.pdf

1. **Identification of the specific information for which confidential treatment is sought:**
   The materials set forth in the Operational Description, block diagram, parts list, and Schematics, 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: **IPH-02276**

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, and schematic. 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 Garmin International, Inc.'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 Garmin International, Inc.

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 Garmin International, Inc. 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. 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,
   Scot D Rogers
   Scot Rogers