

March 7, 2002

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21045

RE: Confidentiality Request for FCC ID: L7KTSPR-01

Dear Sir/Madam,

Nokia Networks hereby requests that the internal photographs (showing the inside of the UltraSite EDGE Base Station or the inside of any unit that is part of the UltraSite EDGE Base Station), schematic diagrams, tuning/calibration procedures, user's manuals, operational descriptions and other technical descriptions be held as confidential items per Section 0.459 of the Commission Rules. This request is based on the following reasons:

The market we are serving with our UltraSite EDGE Base Station is new and technically very advanced, and hence competition between manufacturers is extremely high. We believe that our Base Station contains equipment that some competitors would be extremely keen to get information on. This would provide an unfair advantage to our competitors.

The user's manual is not available to the general public in any form. The user's manual is a sellable item that is only made available to legitimate customers (mobile operators who own FCC licenses for the appropriate frequency airspace). Even customers who have purchased the user's manual must use a unique user name and password to access it on-line. If Nokia were to determine that it was necessary to provide the user's manual to a legitimate 3<sup>rd</sup> party, Nokia would require that a Non-Disclosure Agreement (NDA) be in place before providing the information.

When a Base Transceiver Station (BTS) is installed into a network it is usually placed in an enclosed area, with access only available to authorized personnel. If the BTS is not in a restricted area (possibly because it is on the top of a building) access into the BTS is still not possible due to the fact that the cabinet is securely locked. This means the only way a competitor could get hold of technical information on the BTS is from FCC records. We are concerned that if a competitor is able to get hold of sensitive information on the Nokia BTS, our position as a market leader could be seriously compromised.

It is for these reasons that we would like to file all internal photographs (showing the inside of the UltraSite EDGE Base Station or the inside of any unit that is part of the UltraSite EDGE Base Station), schematic diagrams, tuning/calibration procedures, user's manuals, operational descriptions and other technical descriptions for confidentiality.

Sincerely,

  
Juha Lappalainen

BTS R&D Director