



INVOCON, INC.

INNOVATIVE CONCEPTS IN  
SYSTEMS ENGINEERING

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LETTER OF AUTHORIZATION

Mr. Jeffrey Lenk  
Professional Testing (EMI), Inc.  
1303 West Industrial Boulevard  
Round Rock, TX 78681

1 July 1998

Dear Mr. Lenk:

Invocon, Inc. (IVC) hereby authorizes Professional Testing (EMI), Inc. to submit to the FCC the paperwork required to obtain FCC approval for the Invocon Inc. InvoNet™ RDGU Unit of the Wireless Data Acquisition System (Transmitter Portion).

This authorization expires upon receipt of approval from the FCC for the system referenced above.

Best Regards,

Mary Pate  
VP/General Counsel



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17 August 1998

Federal Communications Commission  
EQUIPMENT APPROVAL SERVICES  
P.O. Box 358315  
Pittsburgh, Pennsylvania 15251-5315

RE: Request for Confidentiality on INVOCON, Inc. Invocon™ RDGU Unit for the Wireless Data Acquisition System (Transmitter Portion) - **FCC ID # NJM0929159**

To Whom It May Concern:

In accordance with 47 CFR §0.457 and §0.459 this letter is a request that the following items in the subject Equipment Authorization Application be kept confidential and withheld from public inspection:

- All RDGU Schematics
- Block Diagrams
- Internal Photos of the RDGU

We request that these items be kept confidential due to the competitive and proprietary nature of such items. We especially consider the Schematics and the Block Diagrams to constitute trade secret data. In addition we request that the items listed below be granted confidential status as well due to the competitive and technical nature of the materials.

1. In the Test Report of the FCC Application For Certification of an Intentional Radiator:

| Page No. | Description                                                                |
|----------|----------------------------------------------------------------------------|
| 6-14     | Testing information and results                                            |
| 17-19    | Appendix A - Maximum Bandwidth Data Sheet                                  |
| 21-26    | Appendix B - Conducted Peak Power Data Sheet & Spectral Density Data Sheet |
| 28-29    | Appendix C - Processing Gain Analysis Data                                 |
| 31-33    | Appendix D - Antenna Conducted Out-of-Band Emissions Test Data             |
| 35-36    | Appendix E - Radiated Out-of-Band Emissions Test Data                      |
| 38-39    | Appendix F - Conducted Emissions Test Data                                 |
| 41       | Appendix G - Frequency Stability Test Data                                 |
| 42       | Appendix H - Maximum Permissible Exposure Test Data                        |

2. FCC Application Additional Information dated 12 August 1998 sent in response to inquiry of FCC on RF hazard dated 11 Aug 1998.

47 CFR §0.457(d) states that:

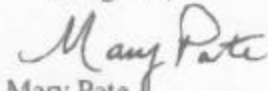
[T]he Commission [FCC] is authorized to withhold from public inspection materials which would be privileged as a matter of law if retained by the person who submitted them, and **materials which would not customarily be released to the public by that person**, whether or not such materials are protected from disclosure by a privilege.

The system that Invocon, Inc. is submitting for equipment authorization has been under development for the past 10 years. We have devoted considerable time and effort in private resources to get to a system that we feel to be commercially viable. We consider all the testing data and information in the pages listed above to be company confidential. We have taken great pains to maintain the secrecy of our system including all technical aspects, revisions and testing with regards to the emission levels, antenna characteristics, and system modifications. In fact, at this point we have not filed a patent because we wish to maintain the trade secret status of the intricacies of our system.

The industry that we are introducing our system to is highly competitive and many of our competitors have resources which far outweigh those of our small company. They literally have enough resources to scan the FCC public records for information on competitive systems. Although, it may seem that some of the pages listed contain generic testing information. In fact, it provides our competitors with technical information as to the modifications and test results of our system. This is not information that we would make available on any basis and it is only available here to conform with the FCC regulations for equipment authorization. It may be argued that without our schematic materials and engineering data, a competitor would not have enough information to do any damage. However, since we are pursuing commercial opportunities with our system, we consider reverse engineering to be a very real danger. It may also be argued that if reverse engineering is a possibility, then holding the listed information confidential would be a useless exercise. However, if a competitor were to pursue reverse engineering of our system, then any information that we could withhold from them, including testing data, would be to our advantage.

Therefore, we would request that the FCC approve this request for nondisclosure and protect our commercial, trade secret and technical data. If there are any questions regarding this request, please contact the undersigned.

Best Regards,



Mary Pate  
VP/General Counsel