



HARRIS CORPORATION

March 21, 2011

600 Maryland Avenue, S.W.
Suite 850E
Washington, D.C. 20024
phone 1-202-729-3700
fax 1-202-729-3735

www.harris.com

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Final Request for Confidentiality of Harris Corporation for FCC ID No.
NK73186795 (FCC Correspondence Number 39483)**

Dear Ms. Dortch:

Harris Corporation (“Harris”) submits this revised, post grant request for confidentiality. Public disclosure of certain materials included in the above referenced equipment authorization application could reasonably put public safety officials at risk, jeopardize the integrity and value of investigative techniques and procedures, reveal Harris trade secrets due to the nature of the equipment, and harm Harris’ competitive interests. Harris respectfully requests, pursuant to 47 C.F.R. § 0.457(g), 47 C.F.R. § 0.457(d), and 47 C.F.R. § 0.459, that certain documents be held as confidential and withheld from public inspection or be superseded in the Commission’s equipment authorization system by subsequently filed versions. Exhibit A, Exhibit B, and Exhibit C provides listings of Harris’ requested treatment of exhibits, cover letters and correspondence.

- Exhibit A- Harris respectfully requests that these documents be treated as confidential and withheld from public inspection.
- Exhibit B- Harris respectfully requests that these documents be superseded in the Commission’s equipment authorization system because the materials have been subsequently replaced with a revised version.
- Exhibit C- The following documents may be made publicly available without any restrictions.

1. Confidentiality Compliance with 47 C.F.R. § 0.457(g)

Section 0.457(g)(5) and (6) of the Commission’s rules—pursuant to 5 U.S.C. § 552(b)(7)(E) and (F)—provides confidentiality if the production of records would either “disclose law enforcement investigative techniques or procedures,” or “endanger the life or physical safety of public law enforcement.” The product FCC ID No. NK73186795 is intended for use by federal, state, and local public safety entities. The nature of the product make it necessary for the descriptions provided in the equipment authorization application and supporting documents/exhibits— including technical information regarding the performance parameters, design and operation of the technology, and information regarding the identity of the entities proposing to use the product—be withheld from public disclosure and treated as



confidential under Section 0.457(g) of the Commission's rules. A complete list of documents that Harris respectfully requests be treated as confidential and withheld from public inspection is provided in Exhibit A.

To further support Harris' request for confidentiality and to underscore the need for confidentiality, Harris requests that the Commission condition its equipment authorization application as stated below:

Requested Equipment Authorization Conditions:

- (1) *The marketing and sale of these devices shall be limited to federal/state/local public safety and law enforcement officials only; and*
- (2) *State and local law enforcement agencies must advance coordinate with the FBI the acquisition and use of the equipment authorized under this authorization.*

These conditions are respectfully requested to ensure that the product associated with FCC ID No. NK73186795 is limited to its intended use, operated only by federal, state, and local public safety officials, and to prevent and address concerns regarding the proliferation of the equipment to unauthorized users.

Providing confidential treatment of the materials included with the equipment authorization application identified as FCC ID No. NK73186795 would be in compliance with Section 0.457(g) of the Commission's rules—specifically 47 C.F.R. § 0.457(g)(5) and (6). It is crucial to the protection of public safety officials that all materials identified in Exhibit A be treated as confidential and withheld from public inspection.

2. Confidentiality Compliance with 47 C.F.R. § 0.457(d).

Likewise, Section 0.457(d) of the Commission's rules provides that trade secrets may not be routinely made available for public inspection. Harris competes with a number of companies that are developing and marketing similar public safety devices. Harris is careful in protecting proprietary aspects of its equipment design and manufacturing processes due to the sensitive nature of the product. The information for which confidential treatment is sought has been kept confidential from public disclosure by Harris and has not been made available to third parties without the execution of non-disclosure agreements.

Disclosure of the technical information disclosed in the attached documents to competitors could compromise Harris' ability to develop and protect this technology as other companies could reverse engineer products using the information provided as part of the equipment authorization application. Moreover, disclosure of technical content would relinquish valuable proprietary information about the technologies Harris has developed and its manufacturing processes. Disclosure would also offer competitors additional unwarranted insight into the state of Harris' product development, thereby allowing competitors an advantage that would otherwise be unavailable to Harris. Therefore, in furtherance of Section 0.457(d) of the Commission's rules, Harris respectfully requests that all materials identified in Exhibit A be treated as confidential and withheld from public inspection.



3. Confidentiality Compliance with 47 C.F.R. § 0.459(b).

Pursuant to Section 0.459(b)(1-9) of the Commission's rules, Harris provides the following information in support of its request for confidentiality:

- (1) The information disclosed in the attached equipment authorization application includes highly confidential and proprietary technical information about the equipment design and operating characteristics. Harris respectfully request that the attached equipment authorization application, in its entirety, and all supporting materials identified in Exhibit A be withheld from public inspection.
- (2) The Commission proceeding by which the information is submitted is identified as—FCC ID No. NK73186795.
- (3) Disclosure of the technical information disclosed in the application to competitors could compromise Harris' ability to sell and continue to develop the product line. Public disclosure of the information in the attached documents would provide other companies the opportunity to reverse engineer the communications technology.
- (4) There are many competitors that produce similar public safety equipment. Thus, any disclosure of Harris technical information regarding this product would relinquish valuable proprietary information about the how the technology was developed and the manufacturing process. Disclosure would also offer competitors additional unwarranted insight into the state of Harris' product development, thereby allowing competitors an advantage that would otherwise be unavailable to Harris.
- (5) Disclosure would result in substantial competitive harm to Harris. Disclosure would offer competitors insight into Harris' product development process and provide competitors a competitive advantage in the market.
- (6) Harris is careful in protecting proprietary aspects of its equipment design and manufacturing processes. The information for which confidential treatment is sought has been kept confidential from public disclosure by Harris throughout development. It has only been made available to third parties pursuant to non-disclosure agreements.
- (7) None of the technical information included in the attached equipment authorization application has been made available to the public. Information revealed to third parties was made pursuant to non-disclosure agreements.
- (8) Harris requests that this information be withheld from public disclosure until and unless Harris notifies the Commission that such information may be publicly released. This equipment is designed for use by authorized users only and may be used for more than a decade in some cases. Moreover the equipment will be used by federal, state, and local public safety officials, thus, it is important that its design and operational details not be made available to unauthorized persons who might attempt to use knowledge of such details to compromise the applications for which the equipment will be employed.



(9) Confidential treatment of the information contained in the attached equipment authorization application allows Harris to provide a full technical description of the equipment. However, refusal to treat such documents as confidential would result in submission of insufficient information on which the Commission could base its decision and delay deployment of these new and improved public safety devices.

For the foregoing reasons, Harris respectfully requests that the Commission treat the attached equipment authorization application and supporting materials as confidential and withhold them from public inspection. If Harris' request for confidentiality is found to be incomplete, Harris respectfully requests the Commission notify Harris of any deficiencies and provide Harris reasonable time to provide additional information. Should Harris' request for confidentiality be denied, Harris respectfully requests that the Commission return all materials to which confidentiality cannot be provided.

Respectfully submitted,

/s/

Tania W. Hanna, Esq.
Vice President, Legislative Affairs and Public Policy
Harris Corporation
600 Maryland Avenue, S.W.
Suite 850E
Washington, D.C. 20024
E-mail: thanna@harris.com
Phone: (202) 729-3712

Evan S. Morris, Esq.
Counsel, Government Relations
Harris Corporation
600 Maryland Avenue, S.W.
Suite 850E
Washington, D.C. 20024
Email: evan.morris@harris.com
Phone: (202) 729-3702



Exhibit A

Harris respectfully requests that these documents be treated as confidential and withheld from public inspection.



Exhibit Type	Filed Description	Correspondence Number	Date Submitted	Action Requested
Block Diagram	Block Diagrams	N/A	2010-05-05 10:47:35.063	Hold as Confidential
Cover Letter	Request for Condition	N/A	2010-05-07 14:38:48.146	Hold as Confidential
Cover Letter	Confidential Response to Correspondence	38845	2010-05-20 16:24:59.41	Hold as Confidential
Cover Letter	Response to Correspondence 38912 with Confidential Attachments	38912	2010-06-10 10:28:23.41	Hold as Confidential
Cover Letter	Intended Use and Operational Description Clarification- Confidential	N/A	2010-07-15 10:00:38.46	Hold as Confidential
External Photos	Converter Front 1 of 2	N/A	2010-05-05 10:52:42.363	Hold as Confidential
External Photos	Converter Front 2 of 2	N/A	2010-05-05 10:52:46.393	Hold as Confidential
Internal Photos	Front of Cards 1	N/A	2010-05-05 11:07:05.3	Hold as Confidential
Internal Photos	Front of Cards 2	N/A	2010-05-05 11:07:09.52	Hold as Confidential
Internal Photos	Front of Cards 5	N/A	2010-05-05 11:07:24.3	Hold as Confidential
Internal Photos	Back of Cards	N/A	2010-05-05 11:06:57.706	Hold as Confidential
Internal Photos	Cards in Chassis	N/A	2010-05-05 11:07:01.793	Hold as Confidential



Exhibit Type	Filed Description	Correspondence Number	Date Submitted	Action Requested
Internal Photos	Front of Cards 3	N/A	2010-05-05 11:07:14.556	Hold as Confidential
Internal Photos	Front of Cards 4	N/A	2010-05-05 11:07:20.533	Hold as Confidential
Internal Photos	Front of Cards 6	N/A	2010-05-05 11:07:27.633	Hold as Confidential
Internal Photos	Front of Cards 7	N/A	2010-05-05 11:07:31.373	Hold as Confidential
Internal Photos	Front of Cards 8	N/A	2010-05-05 11:07:36.276	Hold as Confidential
Internal Photos	Front of Cards 9	N/A	2010-05-05 11:07:39.823	Hold as Confidential
Internal Photos	Front of Cards 10	N/A	2010-05-05 11:07:45.236	Hold as Confidential
Internal Photos	Front of Cards 11	N/A	2010-05-05 11:07:53.973	Hold as Confidential
Operational Description	Operational Description	N/A	2010-05-05 10:47:41.46	Hold as Confidential
Parts List/Tune Up Info	Parts List Mechanicals	N/A	2010-05-17 12:24:46.823	Hold as Confidential
Parts List/Tune Up Info	Parts List Bypass LO	N/A	2010-05-17 12:24:47.036	Hold as Confidential
Parts List/Tune Up Info	Parts List Bypass RX	N/A	2010-05-17 12:24:47.34	Hold as Confidential



Exhibit Type	Filed Description	Correspondence Number	Date Submitted	Action Requested
Parts List/Tune Up Info	Parts List Bypass	N/A	2010-05-17 12:24:47.573	Hold as Confidential
Schematics	Schematics 1 of 5	N/A	2010-05-05 10:47:43.413	Hold as Confidential
Schematics	Schematics 2 of 5	N/A	2010-05-05 10:47:45.356	Hold as Confidential
Schematics	Schematics 3 of 5	N/A	2010-05-05 10:47:46.79	Hold as Confidential
Schematics	Scehmatics 4 of 5	N/A	2010-05-05 10:47:48.226	Hold as Confidential
Schematics	Schematics 5 of 5	N/A	2010-05-05 10:47:49.516	Hold as Confidential
Test Setup Photos	Powerline Conduced Emissions with Converter	N/A	2010-05-05 10:52:54.626	Hold as Confidential
Test Setup Photos	Powerline Conducted Emissions with Converter	N/A	2010-05-05 10:52:55.583	Hold as Confidential
Test Setup Photos	Radiated Emissions Test with Converter	N/A	2010-05-05 10:52:56.416	Hold as Confidential
Users Manual	Operator Manual	N/A	2010-05-05 10:47:40.636	Hold as Confidential



Exhibit B

Harris respectfully requests that these documents be superseded in the Commission's equipment authorization system because the materials have been subsequently replaced with a revised version.



Exhibit Type	Filed Description	Correspondence Number	Date Submitted	Action Requested
Cover Letter	Correspondence Routing	N/A	2010-06-22 15:14:10.656	Superseded by document listed in Exhibit C
Cover Letter	Response to Correspondence 39041 Confidential	39041	2010-07-26 17:35:36.27	Superseded by document listed in Exhibit C
Cover Letter	Request for Confidentiality	N/A	2010-05-05 10:47:33.783	Superseded by document listed in Exhibit A
Cover Letter	Request for Alternate Method of Positively Identifying Equipment	N/A	2010-05-14 16:45:03.42	Superseded by document listed in Exhibit A
Cover Letter	Revised Request for Confidentiality	N/A	2010-11-04 11:20:36.61	Superseded by document listed in Exhibit A
Cover Letter	Revised Request for Confidentiality	N/A	2010-10-12 18:21:35.776	Superseded by document listed in Exhibit A
ID Label/Location Info	Manual Notification	N/A	2010-05-14 16:45:12.04	Superseded by document listed in Exhibit C
ID Label/Location Info	Manual Cover Notification	N/A	2010-05-14 16:45:12.82	Superseded by document listed in Exhibit C
ID Label/Location Info	Manual Table of Contents Notification	N/A	2010-05-14 16:45:13.296	Superseded by document listed in Exhibit C



Exhibit Type	Filed Description	Correspondence Number	Date Submitted	Action Requested
ID Label/Location Info	Amended ID Label	N/A	2010-07-14 12:09:56.763	Superseded by document listed in Exhibit C
ID Label/Location Info	Revised ID Label	39270	2010-11-09 10:43:27.973	Superseded by document listed in Exhibit C
RF Exposure Info	RF Exposure 2100MHz	N/A	2010-05-18 16:42:37.45	Superseded by document listed in Exhibit C
RF Exposure Info	Amended RF Exposure Report	N/A	2010-07-26 17:35:40.82	Superseded by document listed in Exhibit C
Test Report	Test Report 1 of 4	N/A	2010-05-05 10:52:47.953	Superseded by document listed in Exhibit C
Test Report	Test Report 2 of 4	N/A	2010-05-05 10:52:50.036	Superseded by document listed in Exhibit C
Test Report	Test Report 3 of 4	N/A	2010-05-05 10:52:51.666	Superseded by document listed in Exhibit C
Test Report	Test Report 4 of 4	N/A	2010-05-05 10:52:53.746	Superseded by document listed in Exhibit C
Users Manual	Operators Manual Updated with FCC ID Notifications	N/A	2010-05-14 16:45:11.626	Superseded by document listed in Exhibit A
Cover Letter	Final Revised Request for Confidentiality	39483	2011-03-14	Superseded by document listed in Exhibit C



Exhibit C

The following documents may be made publicly available without any restrictions.



Exhibit Type	File Description	Correspondence Number	Date Submitted	Action Requested
Cover Letter	Revised Correspondence Routing	39483	2011-03-13 16:24:24.326	None
Cover Letter	Revised Response to Correspondence 39041	39483	2011-03-13 16:24:25.17	None
ID Label/Location Info	Revised FCC ID Label	39483	2011-03-13 16:24:23.693	None
RF Exposure Info	Revised RF Exposure Report 2100MHz	39483	2011-03-13 16:24:22.66	None
Test Report	Revised Test Report 1 of 4	39483	2011-03-13 16:24:10.203	None
Test Report	Revised Test Report 2 of 4	39483	2011-03-13 16:24:17.45	None
Test Report	Revised Test Report 3 of 4	39483	2011-03-13 16:24:19.183	None
Test Report	Revised Test Report 4 of 4	39483	2011-03-13 16:24:21.076	None
Cover Letter	Final Request for Confidentiality	39483	2011-03-21	None