TIME DOMAIN®
THE PULSE OF THE FUTURE™

Time Domain Corporation
Cummings Research Park
7057 Old Madison Pike
Huntsville, Alabama 35806

Adrian Jennings
Director, Radar Operations
adrian.jennings@timedomain.com
(256) 428 6462

Request for Confidential Treatment

FCC ID No: NUF-RV2-0804

Time Domain Corporation (TDC) requests that the detailed physical block diagram along with all schematics in exhibit three and internal photographs in exhibit four, be withheld from public disclosure in accordance with Section 0.459 of the Commission's Rules, 47 C.F.R. § 0.459 (2000), following grant of the application. In support of this request, TDC submits the following:

(1) identification of the specific information for which confidential treatment is sought:

Time Domain seeks confidentiality for all schematics of the device. These exhibits are segregated from the non-confidential exhibits of the application.

(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.: NUF-RV2-0804.

(3) explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

This material includes circuit diagrams and board layout information for the system. 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 ultra-wideband radar systems that are offered on a highly competitive basis. Customers for this equipment have a variety of competing sources of supply.

(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 eighty engineering personnel, who have designed the equipment and the manufacturing processes. Disclosure would also offer competitors additional unwarranted insight into the state of product development thereby allowing such competitors an advantage that would not be available to them unless they were working with TDC and had a non-disclosure agreement with TDC.

(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 TDC 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. The protection sought is narrowly drawn and pertains to certain specific implementations of ultra-wideband technology.

(8) justification of the period during which the submitting party asserts that material should not be available for public disclosure:

This material should not be disclosed for at least five years. Disclosure of the design information would lead to insights into both designs and manufacturing techniques and could have an adverse competitive effect for many years to come. (Time Domain is aware, for example, of overseas competitors for this application.) As this is industrial equipment, we expect the equipment to be used for more than five years in some cases.

(9) any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:

See item 8 above. Note that the equipment for which approval is being sought will be employed in applications that inherently carry a premium on security.

Respectfully: _____

Adrian Jennings
Director, Radar Operations
Cummings Research Park
7057 Old Madison Pike
Huntsville, AL 35806