



USRADAR INC.

SUBSURFACE IMAGING SYSTEMS

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September 28th, 2015

Re: request for confidentiality
FCC ID: OPLQ4-300
Applicant: US Radar Inc.

To Whom It May Concern,

US Radar Inc. herein requests to permanently withhold portions of the equipment certification application from public view. Specifically internal photos, schematics, operational descriptions, and block diagrams. The Commission has previously granted us confidentiality for the following applications:

OPLSPR500M
OPLSPR250M

Justification for confidentiality:

In order to view the inside of the product to which the application refers, the unit would be destroyed. To open the unit, the plastic housing would have to be cut open, as it is permanently closed with an industrial strength adhesive.

Radar absorbent material is glued to the inside of the antenna. To remove the electronics from the housing would destroy this material. Competitors would be unlikely to figure out the specific material and grade, and thus could not replace it. To remove the electronics would also involve de-soldering several connections.

US Radar Inc. has never provided instructions for disassembling its systems. This is internally classified information and only available to the repair department. To open a system it would be destroyed and US Radar Inc. policy is to not repair equipment which has been tampered with.

If this material were to be made public, it would give competitors access to some of the technical knowledge of our product line, in which considerable time and cost have been invested. A knowledgeable individual would be able to estimate the build of material, manufacturing cost, and man-hours of production. They would be able to start reverse engineering our system, and potentially figure out the schematic.

Legal basis of our request can be found in the following references:

McDonnell Douglas Corp. v. NASA, 180 F.3d 303, 304-05 (D.C. Cir. 1999), quoting Critical Mass Energy Project v. NRC, 975 F.2d 871, 879 (D.C. Cir. 1992)(en banc). See also National Parks & Conservation Ass'n v. Morton, 498 F.2d 765, 770(D.C. Cir. 1974)

Worthington Compressors, Inc., v. Costle, 662 F.2d 45, 51 (D.C. Cir 1981), citing national Parks & Conservation Ass'n v. Morton, 498 F.2d 765, 770(D.C. Cir. 1974).

If any additional information is needed, please don't hesitate to reach us at the number provided below.

Thank you for your consideration to this request.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Ronald LaBarca', with a long, sweeping horizontal line extending to the right.

Ronald LaBarca
President