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November 20, 2000

Federal Communications Commission
Authorization and Evaluation Division
Laboratory Division
7435 Oakland Mills Road
Columbia, MD 21046

Dear Sir or Madam:

In reference to the application under FCC ID OZ9USTC-TED-0002I for the US Telemetry Generic TED Transmitter (internal antenna), 0656-0108, we hereby request that the following materials submitted with the application be withheld from public disclosure:

Block Diagrams
Schematics
Theory of Operation
Parts List

The subject device employs the emerging technology, wireless data communications. Research and development of this technology for commercial applications by the public is being explored by a number of entities and companies. The developer of the technology used to produce the instant device, Axonn Corporation, has emerged as one of the industry leaders and has gained a competitive edge over its competition by employing creative and functional circuit designs and production methods. This competitive position has been carefully cultivated and promoted to the benefit of Axonn and its licensees and customers of its technology.

Axonn Corporation and U.S. Telemetry Corporation foresee that this Transmitter shall only be purchased and installed by professionals. We do not currently foresee ourselves making this product available over-the-counter to the average consumer.

The enclosed, close-up photographs of the circuit board clearly show each component and provide the ability to extract cost estimates with a high degree of accuracy. Additionally, these photographs provide enough information to allow an experienced engineer to extract a block diagram of the digital and RF portions of this circuit. If made public, these photographs and the information that can be derived from them might be used to the disadvantage of the applicant in the marketplace.

Axonn Corporation has obtained licenses and continues to file for patents to protect each new generation of its wireless technology. However, as the commission is aware, the time period for grant of such protection does not accommodate the need to bring devices to the marketplace. Accordingly, Axonn Corporation desires to bring its devices to the marketplace without creating undue risk of duplication of technical, proprietary design.

To assist in assuring that Axonn Corporation receives the full value of its license and protects its competitive posture, Axonn Corporation respectfully requests grant of confidentiality for the photographs and Exhibits referenced in the first paragraph and which are attached to the application.

Best Regards,

David Alley
Axonn Corporation