



Federal Communications Commission
Authorization and Evaluation Division

DATE: 27 October 2016

Subject: Confidentiality Request for FCC ID: QZC-ELIR1

Pursuant to FCC 47 CRF 0.457(d) and 0.459 and IC RSP-100, Section 10, the applicant requests that a part of the subject FCC/IC application be held confidential.

Type of Confidentiality Requested	Exhibit
<input type="checkbox"/> Short Term <input checked="" type="checkbox"/> Permanent	16-3066 – Schematics.pdf
<input type="checkbox"/> Short Term <input checked="" type="checkbox"/> Permanent	16-3066 – Operational Description.pdf

Elster Solutions has spent substantial effort in developing this product and it is one of the first of its kind in industry. Having the subject information easily available to "competition" would negate the advantage they have achieved by developing this product. Not protecting the details of the design will result in financial hardship.

Elster Solutions requests permanent confidentiality for the block diagram, because they describe in detail how we chose to distribute system gain and where we locate filtering, both of which are important keys to how we achieve our system performance. Making this information available to our competition would unfairly undermine any competitive advantage we may have. Elster Solutions also requests permanent confidentiality for our schematics since they obviously contain very detailed, intellectual property. Finally, Elster Solutions requests permanent confidentiality for the Operational Description because it contains such sensitive information as our pseudorandom hopping sequence, channel selection and network architecture which is proprietary.

Sincerely,

A handwritten signature in black ink that reads "John Holt".

John Holt
Manager, RF Engineering
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