



Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Elster Solutions
208 S Rogers Lane
Raleigh, NC 27610-2144
United States

T +1 919 212 4800
F +1 919 212 4801

www.elster.com

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Subject: Confidentiality Request for FCC ID: QZC-MNICI

Elster Solutions respectfully requests confidentiality of certain materials provided with the submission of the FCC ID: QZC-MNICI in accordance with 47 CFR 0.457(d) and 47 CFR 0.459. The confidentiality request applies to the: 1) block diagrams; 2) schematics; 3) technical description (theory of operation); and 4) internal photographs contained in this filing and included in the following files.

Type of Confidentiality Requested		Exhibit	Filename
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Block Diagrams	MNIC_Block_Diagrams.pdf
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Technical Description (Theory of Operation)	MNICI_Technical_Description.pdf
<input type="checkbox"/> Short Term	<input checked="" type="checkbox"/> Permanent	Schematics	MNIC_schematic_5D26162_01_005.pdf
<input checked="" type="checkbox"/> Short Term	<input type="checkbox"/> Permanent	Internal Photos	MNIC_Internal_Photos.pdf

The MNICI radio module has been developed at considerable effort and expense by Elster Solutions. These items are considered as Trade Secrets and therefore public access to the proprietary material could possibly result in duplication of equipment that could severely damage the company's business advantage.

Elster Solutions requests permanent confidentiality for the block diagram because it describes 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 Theory of Operation and Technical Description because it contains such sensitive information as our pseudorandom hopping sequence, channel selection and network architecture which is proprietary.

Elster Solutions requests the exhibits selected above as short term confidential be withheld from public view for a period of 180 days from the date of the Grant of Equipment Authorization and prior to marketing. This is to avoid premature release of sensitive information prior to marketing or release of the product to the public.

I appreciate your assistance in this matter.

Respectfully,

Name: John Holt
Title: Principal Engineer
Telephone: 919-250-5557
e-mail: john.holt@honeywell.com

Signature:
Date:

John Holt
3-15-2017