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27<sup>th</sup> October 2006

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

Re: Supplemental Request for Confidentiality  
Application Submitted Under FCC ID: S490806SSR02

By letter dated September 7, 2006 ("Initial Letter"), GroundProbe Pty Ltd ("GroundProbe") requested confidential treatment of certain materials ("Original Confidential Documents") in connection with the submission of the above-referenced application ("Application").

As part of the TCB review process, additional materials ("Additional Confidential Documents") have been required to be submitted to complete the record. These Additional Confidential Documents are being submitted along with this letter in response to the e-mail from CCS' Chris Harvey dated September 30, 2006 ("September 30 E-Mail").

Accordingly, this letter is hereby submitted, pursuant to §0.457(d) (1) (ii) and 0.459 of the Commission's rules, to confirm GroundProbe's prior request for confidentiality with respect to the Original Confidential Documents, and its instant request for confidential treatment of the Additional Confidential Documents. The Original Confidential Documents and the Additional Confidential Documents will be referred to herein collectively as the "Confidential Documents". Specifically, confidential treatment of the following Confidential Documents is requested:

- **SSR Operator Manual**

As explained in the transmittal accompanying this letter, the version of the SSR-X Operator Manual originally submitted to CCS was incorrect. Accordingly, as part of the Additional Confidential Documents being submitted at this time, a new electronic "zip" file (SSR-X\_Operator Manual.zip) containing the correct version of the SSR-X Operator Manual is being submitted, and confidentiality is being requested with respect to the documents contained therein. This correct version of the Operator Manual shall replace the prior incorrect version of the Operator Manual previously submitted in support of the Application. The prior version of the Operator Manual remains confidential for the reasons previously stated, and as a result such file/documents should not be made available to the public.



- **Internal Photographs**

As explained in the transmittal accompanying this letter, in response to the September 30 e-mail, as part of the Additional Confidential Documents being submitted at this time, a new electronic file (SSR-X REB Internal Photos.doc) is being submitted, and confidentiality is being requested with respect to the documents contained therein. This file shall replace the prior photo exhibit previously submitted in support of the Application. The prior photo exhibit remains confidential for the reasons previously stated, and as a result such file/documents should not be made available to the public.

- **Schematics**

As explained in the transmittal accompanying this letter, in response to the September 30 e-mail, as part of the Additional Confidential Documents being submitted at this time, a new electronic file (REB\_Schematics\_Submission2.pdf) is being submitted, and confidentiality is being requested with respect to the documents contained therein. This file shall replace the block diagrams previously submitted in support of the Application. The previously-submitted block diagrams remain confidential for the reasons previously stated, and as a result such file/documents should not be made available to the public.

- **Block Diagrams**

Block Diagrams were submitted as part of the Original Confidential Documents. As explained above, although such file/documents are being replaced with respect to CCS' consideration of the Application, they remain confidential for the reasons previously stated, and as a result should not be made available to the public.

- **Theory of Operation**

The Theory of Operation was submitted as part of the Original Confidential Documents. Such file/documents remain confidential for the reasons previously stated, and as a result should not be made available to the public.

- **Tune-Up Procedure**

As explained in the transmittal accompanying this letter, in response to the September 30 e-mail, as part of the Additional Confidential Documents being submitted at this time, a new electronic file (Tune Up Procedure.pdf) is being submitted, and confidentiality is being requested with respect to the documents contained therein.

In accordance with 47 C.F.R. §0.459, confidential treatment of the Confidential Documents is requested because, as a general matter, these materials contain



detailed system and equipment description and related information about the product that GroundProbe considers to be proprietary, confidential, and a custom design. More specifically, the market for slope monitoring technologies is subject to significant competition. For example, there are several companies that are currently developing very similar technologies to the device subject to this application. GroundProbe's competitors would be unjustly benefited if they were able to obtain access to the Confidential Documents because they would be provided with quicker and easier access into the market while relying on GroundProbe's investments and resources. GroundProbe, on the other hand, would be detrimentally impacted by disclosure of such information and would suffer irreparable injury and substantial harm to its ongoing business operations and competitive position with respect to its Slope Stability Monitoring System.

1. The information in the Confidential Documents is not currently available to the public in any substantially similar form. GroundProbe takes all commercially necessary steps to prevent this information from being disclosed to the public. As a general matter, GroundProbe licenses its technology to the market and maintains strict confidentiality provisions with every license and equipment lease. The control of confidential information with every client, supplier and regulator is a key competitive strategy, and is essential for the protection of technology development undertaken by GroundProbe. More specifically, for example, the SSR Operator Manual contains – in each section – an express confirmation of the confidential nature of the manual and warnings that the manual may not be copied or distributed to third parties. In addition, certain portions of the SSR Operator Manual, as well as the Internal Photographs and Parts List, contain confidential information obtained by GroundProbe in connection with which GroundProbe has, itself, agreed to not publicly disclose.
2. GroundProbe requests that the Confidential Documents be kept confidential indefinitely. Such a time period is justifiable in light of the substantial and continuing competitive concerns inherent in the slope monitoring technology market.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "J Massey".

27<sup>th</sup> Oct 2006

John Massey  
General Manager – Engineering  
GroundProbe Pty Ltd.