

Date Nov 30th 2005

Telecommunication Certification Body
RFI Global Services Ltd.
Pavilion A
Ashwood Park
Basingstoke
Hampshire
RG23 8BG
United Kingdom

Subject: Certification Application
FCC ID: TPADX6000105

1. Identification of the specific information for which confidential treatment is sought:

It is requested that the following information is to be held confidential on behalf of Simrad Stovring AS.

FCC Rules Part 0.459 refers.

Schematic diagram 1 file 12 pages "Schematic DX 45 and 60.pdf"

Partlists 1 file 10 pages "Partlists DX45 and 60.pdf"

PCB layout 1 file 20 pages "PCB DX45 and 60.pdf"

Operational description 1file 4 pages "Operational description.pdf"

Mainbord circuit 1file 10 pages "Mainboard Circuit description-3477.pdf"

2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The proceeding is that involving the application for equipment authorization (certification) under FCC ID No: TPADX6000105

3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

This material includes a detailed theory of operation, circuit diagrams, and schematics. As such, this material is treated as highly confidential business information and not available as general information.

4. Explanation of the degree to which the information concerns a service that is subject to competition:

The material for which confidentiality is sought is employed in the design and manufacture of this transmitting equipment that is offered on a highly competitive basis. Customers for this equipment have a variety of competing sources.

5. Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure would, in effect, give away Simrads investment in this product.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The information for which confidential treatment is sought is kept confidential by Simrad and not made available to third parties except pursuant to non-disclosure agreements.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

To the knowledge of those preparing this application, the information has not been disclosed publicly before. The general theory of operation of this equipment has been the subject of numerous disclosures with suppliers and consultants.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure:

This material should not be disclosed for at least 10 years. While improvements in design are made relatively frequently, disclosure of the design information would lead to insights into both design and manufacturing techniques that could have an adverse competitive effect for many years to come. This equipment is designed for commercial, industrial, and governmental applications. As such, unlike most consumer equipment, this equipment could be used for more than a decade in some cases. As such, it is important that the design not be made available to unauthorized persons who might attempt to use knowledge of the design to compromise the applications for which the equipment will be employed.

Yours sincerely



René Østergaard
Hardware Manager

Simrad Støvring AS
Østre Alle 6
DK-9530 Støvring
Denmark