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KINGRAY • GARMIN



9<sup>th</sup> February, 2006

Our Ref: ED060209-02

Federal Communications Commission  
Office of Engineering and Technology

Your Ref:

Form 731 Confirmation Number: EA939819  
FCC ID: TXJMT401/401FF

Dear Sir Madam

## RE: Notification of Information Provided as Commercial-in-Confidence

The following pertains to our application for FCC approval of a 406MHz EPIRB provided in either manual release (MT401) or Auto-release (MT401FF) configuration.

As requested within the on-line application process, we are writing to advise that the following documents have been provided to the FCC solely on the understanding that they are to be treated as Commercial-in-Confidence:

	(filename)	(exhibit type)
●	42967-1(C-in-C).pdf	Schematics
●	Tech_D-1(C-in-C).pdf	Operational Description

The equipment to which this application applies is the result of substantial R&D investment by the applicant. The new and novel approaches employed within the equipment are the subject of various patent applications outside of the USA. The technology and implementation adopted within the design give it a significant commercial advantage over its competitors [FCC 0.459(3)].

Access to the documentation identified above is likely to assist competitors analyse, reverse engineer, or gain a better understanding of the product so as to circumvent patent protection. Such an outcome would erode or remove the current commercial advantage that these products possess and thereby reduce the market share that they would otherwise command resulting in loss of potential revenue for the applicant [FCC 0.459(5)]. The information contained within these submissions is privileged and is not available to the public or its competitors [FCC 0.459(7)].

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It is Standard Communications intention to continue to produce the equipment models of this application whilst they maintain either or both a commercial or technical/performance advantage over their competitors. It is important therefore that access to the identified information be restricted over the commercial life of these models [FCC 0.459(8)].

Your co-operation in taking all necessary actions to maintain the confidentiality of the identified documents provided is appreciated.

On behalf of Standard Communications Pty Ltd,  
Yours faithfully



Craig Duncan  
Project Engineering Manager