

**Gradys LLC**  
**2595 Interstate Drive, Suite 103**  
**Harrisburg, PA 17110**

Federal Communications Commission  
Laboratory Division  
7435 Oakland Mills Road  
Columbia, MD 21046

**Re: FCC ID No. X8E-1459**  
**Request for Confidential Treatment**

Ladies and Gentlemen:

Gradys LLC (“Gradys”) requests that the application for equipment authorization for FCC ID No. X8E-1459, as well as information set forth in the following exhibits, be withheld from public disclosure in accordance with Sections 0.457 and 0.459 of the Commission’s Rules, 47 C.F.R. §§ 0.457, 0.459 (2005):

Block Diagram;  
Schematics;  
Parts List;  
Tune Up Procedure;  
PCB Inner Layers;  
External Antenna Specification; and  
Circuit Description.

In support of this request, Gradys submits the following:

**(1) Identification of the specific information for which confidential treatment is sought:**

The materials set forth in the exhibits referenced above, which are segregated from the non-confidential exhibits of the application, are those for which confidentiality is sought. Such materials are referred to herein as the “Materials.”

**(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. X8E-1459.

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

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The Materials contain highly confidential business information of Gradys and its affiliates, including circuit diagrams and other technical details as well as other key product details normally kept confidential by Gradys and its affiliates.

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

The Materials are employed in the design and manufacture of radio communications equipment used by consumers in commercial mobile radio services equipment that is offered on a highly competitive basis.

**(5) Explanation of how disclosure of the information could result in substantial competitive harm:**

Disclosure of the Materials would give away the fruits of the labors of Gradys and its affiliates' engineering personnel in the development of the equipment covered by this application. Disclosure would also offer competitors of Gradys and its affiliates unwarranted insight into the state of product development and manufacturing of Gradys and its affiliates thereby allowing such competitors an advantage that would not be available to Gradys and its affiliates.

**(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:**

The Materials are kept confidential by Gradys and its affiliates 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 the application referenced in this letter, the Materials have not been disclosed publicly heretofore by Gradys or its affiliates. The protection sought is narrowly drawn and pertains to certain specific implementations of the mobile radio technology described in the application.

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

The Materials should be kept confidential indefinitely. The equipment is part of a commercial product that will be offered for sale to the public. Even when improvements in design are made, disclosure of the original design information would lead to insights into both design and manufacturing techniques and could have an adverse competitive effect for many years to come. As such, it is important that the internal design details not

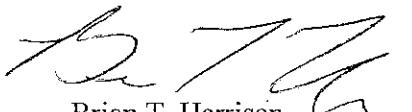
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be made available to unauthorized persons who might attempt to use knowledge of the design to compromise the applications for which the equipment will be employed or to compete unjustly in the production of similar equipment.

**(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:**

See item 8 above.

Respectfully,



Brian T. Harrison  
President, Gradys LLC