

Kaleidescope LLC  
211 E. 7th St. Suite 620  
Austin, TX 78701-3334

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

Re: FCC ID No. ZEE-1013, Long-Term Confidential Treatment

To Whom It May Concern:

In accordance with Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§ 0.457, 0.459 (2005), Kaleidescope LLC and its affiliated companies ("Kaleidescope") request that the application for equipment authorization under FCC ID No. ZEE-1013 and the following exhibits be withheld from public disclosure:

Block Diagram;  
Schematics; and  
Wifi RF Operation Description.

Kaleidescope provides the following in support of this request:

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

Kaleidescope seeks confidentiality for the materials identified above (the "Confidential Materials"), which have been separated from the non-confidential portions of the application.

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 Kaleidescope's application for equipment authorization under FCC ID No. ZEE-1013.

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

The Confidential Materials contain highly confidential information of Kaleidescope, including circuit diagrams and other key product and technical details normally kept confidential by Kaleidescope.

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

Kaleidescope uses the Confidential Materials in designing and manufacturing radio communications equipment used by consumers in commercial mobile radio services equipment. This is a highly competitive field.

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

If the Confidential Materials were disclosed, this would give Kaleidescope's competitors unfair insight into the state of product development and manufacturing of Kaleidescope, thereby allowing such competitors an advantage that would not be available to Kaleidescope. Disclosure of the Confidential Materials would also give away the fruits of the labors of Kaleidescope's engineering personnel in the development of the equipment covered by this application

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

The Confidential Materials are kept confidential by Kaleidescope and not made available 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 referenced application, the Confidential Materials have not been disclosed publicly heretofore by Kaleidescope. The protection sought is narrowly drawn and pertains to certain 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 Confidential Materials should be kept confidential indefinitely. The equipment is 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 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 above.

Respectfully,



Julia A. McCullough  
President, Kaleidescope LLC