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June 19, 2002

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

Att: Richard Fabina
Chief, Equipment Authorization Branch

Re: SAR Report submitted with FCC ID: A3LSCHA595
Confidentiality Request

Gentlemen:

Pursuant to Sections 0.457 and 0.459 of CFR Title 47 FCC Rules and Regulations, PCTEST Lab request confidentiality for the SAR report submitted as an attachment(s) to the subject application for certification for the reference FCC ID: A3LSCHA595. The attachment(s) to the application is (are) identified as "PCTEST Operational Description SAR Report" is marked confidential. This report contains trade secrets and commercial information that are customarily guarded from competitors and are never released to the public. Section 0.457(d)(2) stipulates that such material will be withheld from routine inspection if it is shown that the material contains the type of information specified in the preceding statement. Specifically, the PCTEST Operational Description SAR Report contains processes and procedures developed by PCTEST Lab that enable RF Exposure tests performed at PCTEST Lab to meet the stringent requirements of the most recent FCC released Supplement C guidelines for performing such measurements. Disclosure of this information to competitors will result in material harm to PCTEST Lab.

PCTEST Lab is currently reviewing the document for which they requested confidentiality to insure that it conforms to the requirements of the FCC rules for withholding information. Test data that is contained in the report has been left in to facilitate review of the report by the FCC. However, the test data contained in this section has been duplicated and submitted in a public file along with the SAR plots. The “PCTEST Operational Description SAR Report” contains confidential business information that PCTEST Lab does not release to the public and accordingly does not wish to have made available to the public via the FCC files. PCTEST Lab is aware that the issue of confidential treatment of this report is under review by the OET legal counsel and possibly by the Office of General Counsel of the Commission. Pending a decision by the appropriate authorities, PCTEST Lab will continue to request confidential treatment of the file identified as “PCTEST Operational Description SAR Report”. If the determining authority decides this information cannot be held confidential, PCTEST Lab will inform the Lab as to their intentions to appeal that decision or accept the decision. In the event the decision is accepted by PCTEST Lab, we will not pursue continued confidential treatment of the report and will assist the Lab in any way possible regarding correcting existing records.

In compliance with the provisions of Section 0.457(d) stipulating that test measurements will be made available to the public following the effective date of the authorization, PCTEST Lab has separated the measurement data required to show compliance with the RF Exposure requirements in a separate file identified as "SAR Measurement Data" that will be available for public inspection following the effective date of the authorization.

Please contact the undersigned by telephone at 410-290-6652, or by email at randy@pctestlab.com or by correspondence at the above address if there are any further questions or additional information needed concerning this request for confidentiality.

Regards,

Randy Ortanez
President

Cc: Samsung Electronics Co., Ltd.