



May 24, 1999

Federal Communications Commission
Equipment Services Approval
P. O. Box 358315
Pittsburgh, PA 15251-5315

Subject: GARMIN VHF 725, FCC ID # IPH-37800, Request for Confidentiality

Gentlemen:

GARMIN International, Inc. (GARMIN) has provided an Application for Equipment Authorization (FCC Form 731) and the associated items via the FCC's electronic application process for FCC ID # IPH-37800 and request FCC Certification for this product.

In accordance with CFR 47 CFR 0.459, please accept the following justification to provide confidential status and withhold from inspection the VHF 725 Schematics provided to the Commission as "Schematic725.pdf". This information was provided as a part of the certification application process referred to above.

GARMIN regards the schematics as proprietary and holds that they contain trade secrets. The schematics contain information that substantially represents the electronic design of the device. If provided to the public, competitors may copy the design which places GARMIN at a competitive disadvantage. As such, these schematics are not provided outside GARMIN except for certification purposes. Products are repaired at GARMIN owned and operated facilities.

Disclosure of the schematics will provide unfair competitive advantage to competitors of GARMIN.

GARMIN requests that this information remain confidential and not available to the public for a period of at least 10 years from the date of this letter.

Your early review and approval of these requests is appreciated.

Very truly yours,

A handwritten signature in black ink, appearing to read "Van Ruggles", written over a horizontal line.

Van Ruggles
Director of Quality Assurance