Radiodetection
A United Dominion Company

WESTERN DRIVE, BRISTOL BS14 0AZ, ENGLAND

FCC ID: K68ND2099A - Application for Equipment Certification

Request for Material to be Withheld from Public Inspection

Introduction

The Radiodetection Dual Frequency Datasonde (part number ND2099-DF-HP-1) is part of the Radiodetection Drilltrack system. The DrillTrack system is designed to provide the operator of a horizontal directional drill machine with information on the drillhead.

Request for Material to be Withheld from Public Inspection

For the reasons presented below, it is requested that the information detailed below is withheld from public inspection for a period of five years from its submission to the FCC by Radiodetection.

Identification of Confidential Information

Confidential treatment is being sought for the following information concerning the Radiodetection ND2099-DF-HP-1 datasonde:

- schematic circuit diagrams
- internal photographs

A detailed list of confidential items is presented in Appendix 1

Reason for Submission

The information is submitted in support of an application for FCC certification of the ND2099-DF-HP-1 datasonde.

Degree to which the Information is Confidential

The information is confidential for commercial and financial reasons because Radiodetection has invested considerable design effort and expense in developing the datasonde and the system with which it works.

Degree to which the Information concerns a Service subject to Competition

The datasonde is part of a system is designed to provide the operator of a horizontal directional drill machine with information on the drillhead. The market for products such as these is highly competitive. The system is sold to customers such as public utilities and telecommunications companies. The USA is Radiodetection's largest market.

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Harm to Competitiveness Resulting from Disclosure of the Information

Design and development costs make a significant contribution to the overall costs of our products and those of competitors. The products' time-to-market depends to the time taken to complete the design phase. The disclosure of the information would give a competitor an unfair advantage by allowing it to reduce its design time and expenditure.

Measures taken to Prevent Unauthorized Disclosure

All Radiodetection designs are treated as 'Company Confidential'. Design information is not released to third parties, other than those providing sub-contact production services to Radiodetection. Sub-contractors are subject to confidentiality agreements.

Availability of the Information to the Public and Previous Disclosure to Third Parties

The information submitted to the FCC is not available to the public or published by Radiodetection in its technical literature or handbooks. Products are sold only by Radiodetection and its own agents. There has been no previous disclosure to third parties, other than sub-contractors covered by confidentiality agreements.

Justification for Period of Non-disclosure

A non-disclosure period of five years is requested to ensure the any future disclosure of Radiodetection's design will not take place until the datasonde and its design ideas are no longer of commercial value.

For and on behalf of Radiodetection Limited,

Roger Lee
Principal Engineer (Approvals)

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Appendix 1

List of Confidential Information

Drawing	Item
ND2095.A	Micro PCB Schematic Diagram
ND2096.A	Output PCB Schematic Diagram
RS1088.A	Roll Sensor Track PCB Schematic Diagram
RS1089.A	Roll Sensor Segment PCB Schematic Diagram
Photograph	ND2099 Datasonde Internal Bottom View
Photograph	ND2099 Datasonde Internal Top View
Photograph	ND2095 Micro PCB Top View
Photograph	ND2095 Micro PCB Bottom View
Photograph	ND2096 Output PCB Top View
Photograph	ND2096 Output PCB Bottom View

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