



19625 62ND AVENUE SOUTH, SUITE B-103 • KENT, WASHINGTON 98032 USA
PHONE 425-251-0701 • FAX 425-251-0702 • www.digitrak.com

October 23, 2014

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

To whom it may concern,

We hereby request that, pursuant to § 0.457(d) & 0.459 of the Commission's rules (CFR 47), the documents listed below and attached with this application for certification of FCC ID: KKGB2DIG1 be provided with confidential status and not made routinely available for public inspection:

Exhibit Type	File Name
Operational Description	DR2_OpDes – CONFIDENTIAL.pdf
Block Diagram	DR2_BlkDia – CONFIDENTIAL.pdf
Tuning Procedure	DR2_TunPro – CONFIDENTIAL.pdf

Any exhibit/information for which we have requested confidentiality, but which may not be accorded such treatment by the FCC, should be returned to us.

The documents listed above contain company trade secrets. Significant engineering resources were expended designing the parts of the product shown in the schematics, frequency block diagram, and operational description. It is our belief that it would be quite difficult, if not impossible, to reverse-engineer the product from publicly available information (including the product itself).

Substantial competitive harm to us could therefore result should these documents be made available to the public. We face both domestic and foreign competition in our market (locating equipment for horizontal directional drilling), including product piracy (attempts at direct knock-offs). Disclosure of the documents listed above would provide our competitors and potential product pirates with an unfair competitive advantage, by allowing them to copy our technical solutions without the development expense.

We protect this information through the following primary procedures: (1) all employees and contractors are required to sign nondisclosure agreements, as are any visitors, vendors or other third parties who may be exposed to any confidential information, and (2) the information is only provided to employees and third parties on a "need to know" basis. The information is not publicly available, and is not included in our operating manuals or on our website. We are not aware of the information listed above having been disclosed to any third party not bound by a nondisclosure agreement.

The materials listed above should not be available for public disclosure at any time. Our products can remain in service for extended periods of time (more than ten or fifteen years), and the rate of significant technological change in our industry is sufficiently slow that even the copying by our competitors of technical information from many years in the past could result in the creation of a product that might be competitively harmful to us.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Th. J. Hall', is written over a horizontal line.

Thomas J. Hall, General Counsel, Digital Control Incorporated