



L.L.C.

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November 12, 2001

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

Dear Sir or Madam:

In reference to the application under FCC ID L2VAXC550 for the Axonn LLC AXC550 Transmitter, 0807-0100, we hereby request that the following materials submitted with the application be withheld from public disclosure:

Section 4 Block Diagrams Section 4 Schematics

Each Exhibit covered by the instant request is marked on the cover page to each. In support of its request for confidentiality, the following is stated.

The subject device employs the emerging technology, spread spectrum. Research and development of this technology for commercial applications by the public is being explored by a number of entities and companies. The developer of the technology used to produce the instant device, Axonn LLC, has emerged as one of the industry leaders and has gained a competitive edge over its competition by employing creative and functional circuit designs and production methods. This competitive position has been carefully cultivated and promoted to the benefit of Axonn and its licensees of its technology.

Axonn LLC foresees that this Transmitter shall only be purchased and installed by professionals. We do not currently foresee ourselves making this product available over-the-counter to the average consumer.

Axonn LLC has obtained licenses and continues to file for patents to protect each new generation of its spread spectrum technology. However, as the commission is aware, the time period for grant of such protection does not accommodate the need to bring devices to the marketplace. Accordingly, Axonn LLC desires to bring its devices to the marketplace without creating undue risk of duplication of technical, proprietary design.

To assist in assuring that Axonn LLC receives the full value of its license and protects its competitive posture, Axonn LLC respectfully requests grant of confidentiality for the Exhibits referenced in the first paragraph and which are attached to the application.

Best Regards,

David Alley
Axonn LLC