



April 26, 2005

Attention:
Application Examiner
Reviewing Engineer

Re: Request for confidentiality

Applicant: Topcon Positioning Systems, Inc.

FCC ID: LCB-860801

To whom it may concern,

Request is hereby submitted by Topcon Positioning Systems, Inc. to withhold from public review certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) of the FCC Rules.

In particular, the following sections of the application are to be kept confidential:

- Schematics
- Detailed Block diagrams
- Detailed Operational/Functional Description
- TPO Control Algorithm

Rationale for request for confidentiality:

Topcon Positioning Systems, Inc. has invested considerable time and materials in research and development to produce the referenced product. Disclosure of the confidential portions of this application to competitors would not only give them significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by us.

If you have questions or need further information, please contact the undersigned.

Sincerely,

Kent Mizuide
Director of GPS product planning
Topcon Positioning Systems, Inc.

**Topcon
Positioning
Systems, Inc.**

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