



22 Oct 1999

Mr. Charlie Cobbs
Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Dear Mr. Cobbs:

I am writing to avoid the possibility of an inadvertent disclosure of proprietary information.

The accompanying Form 731 is being filed with the Commission on our behalf by Elliott Laboratories, Inc., a consulting and testing laboratory. Included as an exhibit with the enclosed application are block diagrams, schematic diagrams, and the Theory of Operation requested in Form 731.

It is our intention to provide the Commission with a full disclosure of our process so that its merits can be evaluated fully. Indeed, we are pleased to provide any further information that the Commission might wish to see. It is not our intention, however, to make our proprietary process a matter of public record. In view of the fact that the block diagrams and associated Theory of Operation disclose the mechanism of our process, we ask that these portions (block diagrams, schematic diagrams, and Theory of Operation) of our application be withheld from public inspection as provided under FCC §0.459. These diagrams contain details of the operation of circuitry which is partially embedded in complex NovaRoam 900 devices. These details are not readily discernible – even to technically sophisticated individuals – from our hardware and constitute trade secrets.

We request that these documents and this letter be segregated from the book evaluation report and withheld from public inspection.

Thank you for your attention. Please let the undersigned know if the Commission disagrees with our position or requires further justification.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Krotchen", is written over a light blue horizontal line.

Paul Krotchen
Vice President
Nova Engineering