

VCom Inc.

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23 September 2005

Federal Communications Commission
Authorization and Evaluation Division

Confidentiality Request regarding application for certification of VCom BST1918
1.9 GHz Base Station Transceiver, **FCC ID: OPPBST1918-B1901**

Pursuant to Sections 0.457 and 0.459 of the Commission's Rules, we hereby request confidential treatment of information accompanying this application as outlined below:

Schematic Diagrams, Block Diagrams, Parts Lists, Tune-up Procedures

We have requested that the information listed above required to be submitted with this application be withheld from public review.

Reason for request:

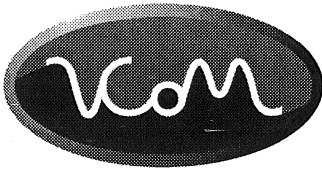
This information is a trade secret. VCom Inc. developed the BST1918 product in response to commercial marketplace requirements. Its design and functional features are exclusive to VCom.

The BST1918 product is offered in the highly competitive Point-to-Multi-Point Fixed Broadband Wireless service market. Technology in the field of wireless communications is evolving rapidly, and confidentiality of proprietary design information is essential to maintain competitiveness in this market. Disclosure of this information may allow competitors to benefit from VCom's intellectual property.

All employees of VCom Inc. are required to sign an Intellectual Property Agreement form upon becoming employed with VCom. This will identify the responsibility and rights of both VCom and the employee in regard to any interest or rights involved in the discoveries, inventions, improvements, etc. normally referred to as "Inventions" which are made by the employee during the course of his/her work.

All OEM manufacturing partners, as well as any visitors to the plant, are required to sign non-disclosure agreements prior to being granted access to production and research/development areas. Electronic originals of proprietary documents are password protected and hardcopies are controlled.

This information is not available to the public and there have been no disclosures to parties who are not employees of VCom with the exception of Bay Area Compliance Lab Corp., who is acting on our behalf as an agent to FCC.



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The period of time required for nondisclosure for the BST1918 product is for the life of the product (typically 20 years) and beyond, since features of the current design may be incorporated in future VCom products. This period should therefore be 20 years.

The BST1918 product cannot be readily reverse-engineered without the schematics and parts lists. The BST1918 incorporates proprietary software embedded in its circuits that is essential for its operation.

The BST1918 is not sold directly to the general public; it is sold only to known, approved customers after credit check. No units are sold to known or potential competitors where there may be a possibility of reverse engineering. The BST1918 requires professional installation.

The applicant understands that pursuant to Section 0.457 of the Rules, disclosure of this application and all accompanying documentation will not be made before the date of the Grant for this application.

Please contact me if there is any additional information you may need.

Sincerely,

Darryl Wurtz, Quality Assurance Manager

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