

# **Request for non-disclosure of information in certification application**

## **1 Confidential information identification**

mXII24 Schematic, eight (8) pages

mXII24 Parts list, two (2) pages (Excel spreadsheet, number pages may vary depending on printer used)

## **2 Application in which the information appears**

FCC part 15 certification application. FCC ID: PNVMF24

## **3 Degree to which information is confidential**

All information identified above is confidential

## **4 Degree to which information concerns a product or service that is subject to competition**

The wireless SCADA market is highly competitive. There are several large players like P-COM, Breezecom and Wi-LAN, offering high-end wireless data solutions. There is also a myriad of smaller players offering less sophisticated solutions.

## **5 How disclosure of the information can cause competitive harm**

ComLink is the only company whose product allows digital multiplexing of voice, video and data with a single wireless transceiver. Disclosure could enable competitors to benefit from intellectual property unique to ComLink, contained in the product.

## **6 Measures taken to keep the information confidential**

All ComLink employees must sign a confidentiality agreement at the time of hiring. Furthermore, all confidential information is released only to employees who are required to use it for official company business only. Finally, all confidential information is stored in electronic form on a file server residing on the company premises and is accessible only by authorized employees from workstations located exclusively on-premises.

## **7 Availability of information**

The information identified above has never been made available to the public. Certain parts of it have been disclosed, under confidentiality agreements, to third parties involved in supply, production and consulting activities for ComLink.

## **8 Period of time over which protection of confidentiality is requested**

ComLink request a protection period of 3 years for the confidential information identified above. We estimate this information will continue to provide a competitive advantage over the life of the product and are not planning to release it to the public within the stated period.

## **9 Additional info**

ComLink's wireless products have had great success outside of North America over the past 2 years. We have turned down licensing requests for the technology from Asian manufacturers. ComLink's intellectual property is contained in the hardware and in the firmware used in the product. The complexity of the product and the fact the firmware source code is not available to the public make reverse engineering the product virtually impossible. However, since ComLink makes the latest versions of executable firmware available to its customer base for ease of product maintenance and upgrade, making the schematics and parts lists available to the public would make copying our product very easy for interested parties. It would be a simple matter of building the product as per the schematics and parts lists, obtaining the latest version of the firmware from a current ComLink customer and downloading that firmware in the copied product. No other knowledge or expertise would be required from the third party. Because of the international success of the product, the threat of piracy by an unscrupulous third party is very real. Keeping the information identified above confidential is essential in protecting ComLink's intellectual property.