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13th Nov 2017

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

Re: Request for Confidentiality
Application Submitted Under FCC ID: **S490917SSR04**

Pursuant to §0.457(d) (1) (ii) and 0.459 of the Commission's rules, GroundProbe Pty Ltd ("GroundProbe") requests confidential treatment of the following materials (referred to herein as the "Confidential Documents") accompanying GroundProbe's above-referenced application:

- SSR-XT Operator Manual;
- Internal Photographs;
- Schematics;
- Block Diagrams;
- Theory of Operation; and
- Tune-Up Procedure

In accordance with 47 C.F.R. §0.459, confidential treatment of the Confidential Documents is requested because, as a general matter, these materials contain detailed system and equipment description and related information about the product that GroundProbe considers to be proprietary, confidential, and a custom design. More specifically, the market for slope monitoring technologies is subject to significant competition. For example, there are several companies that are currently developing very similar technologies to the device subject to this application. GroundProbe's competitors would be unjustly benefited if they were able to obtain access to the Confidential Documents because they would be provided with quicker and easier access into the market while relying on GroundProbe's investments and resources. GroundProbe, on the other hand, would be detrimentally impacted by disclosure of such information and would suffer irreparable injury and substantial harm to its ongoing business operations and competitive position with respect to its Slope Stability Monitoring System.

1. The information in the Confidential Documents is not currently available to the public in any substantially similar form. GroundProbe takes all commercially necessary steps to prevent this information from being disclosed to the public. As a general matter, GroundProbe licenses its technology to the market and maintains strict confidentiality provisions with every license and



equipment lease. The control of confidential information with every client, supplier and regulator is a key competitive strategy, and is essential for the protection of technology development undertaken by GroundProbe. More specifically, for example, the SSR-XT Operator Manual contains – in each section – an express confirmation of the confidential nature of the manual and warnings that the manual may not be copied or distributed to third parties. In addition, certain portions of the SSR-XT Operator Manual, as well as the Internal Photographs and Parts List, contain confidential information obtained by GroundProbe in connection with which GroundProbe has, itself, agreed to not publicly disclose.

2. GroundProbe requests that the Confidential Documents be kept confidential indefinitely. Such a time period is justifiable in light of the substantial and continuing competitive concerns inherent in the slope monitoring technology market.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D Noon".

Dr David Noon

VP – Global Operations & Sales

GroundProbe Pty Ltd