

ROGERS LABS, INC.

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April 3, 2015

Timco Engineering Inc.
849 NW State Road 45
Newberry, FL 32669

Office of Engineering and Technology
Federal Communications Commission
Columbia, MD 21046

Applicant: STAR Systems International, Limited
Unit A01, 24/F, Gold King Industrial Building 35-41 Tai Lin Pai Road
Kwai Chung, New Territories Hong Kong - SAR

Re: Confidentiality for submittal information regarding FCC ID number 2AA7K-ORION
PRODUCT: Location and Monitoring Service Transmitter

Dear Sirs:

STAR Systems International, Limited requests that the material in the **Schematics, Block Diagram, Parts List, and Operational Description** be withheld from public disclosure pursuant to Sections 0.457 and 0.459 of the Commission's Rules following grant of the application. In support of this request, STAR Systems International, Limited submits the following:

Long Term Confidential Files Include

Schematics	File Name	Conf Schem Orion.pdf
Parts List	File Name	Conf PartList Orion.pdf
Block Diagram	File Name	Conf BlkDia Orion.pdf
Operational Description	File Name	Conf OpDes Orion.pdf

1. Identification of the specific information for which confidential treatment is sought:

The materials set forth in the Operational Description, Block Diagram, Parts List, and Schematics, which are segregated from the non-confidential exhibits of the application, are those for which confidentiality is sought.

2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The proceeding is that involving the application for equipment authorization (certification) under FCC ID No: **2AA7K-ORION**

3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

This material includes a detailed theory of operation, circuit diagrams, schematic diagrams, and any detail Parts List. As such, this material is treated as highly confidential business information.

4. Explanation of the degree to which the information concerns a service that is subject to competition:

The material for which confidentiality is sought is employed in the design and manufacture of this transmitting equipment that is offered on a highly competitive basis. Customers for this equipment have a variety of competing sources.

5. Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure would provide competitors the benefits of STAR Systems International, Limited engineering personnel who designed the equipment and the manufacturing process. Disclosure would also offer competitors additional unwarranted insight into the state of the product development, thereby allowing competitors an advantage, not available to STAR Systems International, Limited.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The information for which confidential treatment is sought is kept confidential by STAR Systems International, Limited and not made available to third parties except pursuant to non-disclosure agreements.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

To the knowledge of those preparing this application, the information has not been disclosed publicly heretofore. While the general theory of operation of this equipment has been the subject of numerous disclosures in industry and standards groups as well as in rule making proceedings of the FCC, the protection sought is narrowly drawn and pertains to certain specific implementations of this radio technology.

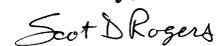
8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure:

This material should not be disclosed for at least 25 years. While improvements in design occur, disclosure of the design information would lead to insights into both design and manufacturing techniques that could have an adverse competitive effect for many years to come. As such, it is important that the design not be made available to unauthorized persons who might attempt to use knowledge of the design to compromise the applications for which the equipment will be employed.

Should you require any further information, please contact the undersigned.

Thank you for your consideration in this matter.

Sincerely,



Scot Rogers