
The Genie Company
22790 Lake Park Boulevard
Alliance, Ohio 44601
October 6, 2000

Federal Communications Commission
Laboratory Division
7435 Oakland Mills Road
Columbia MD 21046

Re: Form 731 Application for Equipment Authorization Confidentiality Statement for Confirmation
Number EA98912 with FCC ID: B8QACSCT1 A Low Power Transmitter Submitted September 29, 2000

Dear Sir or Madam:

The following items are requested to be confidential Pursuant to 47 C. F. R. section 0.459:

Instruction sheet – The instruction sheet is the primary information we would like safeguarded. The instruction sheet if released would reveal vital company trade secrets as to new method of coding a garage door transmitter. The instructions reveal the entire interface to the customer for learning a transmitter to the operator – as essential part of the door operator's functionality.

Schematic, Internal Photographs, Expository – reveal change to a 3 volt battery that we would like confidential as this new feature is a trade secret that will make dealers prefer this product.

Schematic, exterior photograph, internal photograph – Reveals the LED employed that in this product line is a new feature that needs to remain a trade secret until the product is on the shelves.

It is the object of this letter to gain you cooperation in maintaining the confidentiality for the form 731 application mentioned in accordance with the form's instructions. Disclosure of the information could result in substantial competitive harm by revealing our product in advance of its being available and allow competitors to prepare plans, tactics, and materials to enhance their competitive position. Release of the material would also allow competitors to start creating new products before our products are for sale. The end result of release of the information could be significantly reduced sales and profits to the corporation.

Meetings inside the corporation have been limited to essential personnel. Genie has limited access to the information only to about 15 people internal to the corporation and has made secrecy a high priority on the project. Outside the corporation the information has been shared with only one company and that was protected by a non-disclosure agreement. The one company disclosed to is Microchip -- which manufactures the I. C. used inside the product. There has been no disclosure to the public.

The period of time requested by Genie for the material not to be disclosed is one year past the time of submittal to allow time for manufacture, distribution to resellers, and for the competition to become aware of the product.

Sincerely,
Jerry Shore
RF Group Leader
The Genie Company