



CORPORATION

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April 29, 1999

Federal Communications Commission  
Charles Cobbs, Acting Chief  
Equipment Authorization Division  
7435 Oakland Mills Road  
Columbia, MD 21046

Re: Request that material or information submitted to the FCC be withheld from public inspection.

Dear Mr. Cobbs:

Pursuant to Sections 47 C.F.R. 0.457 and 0.459 of the Federal Communications Commission's rules, Axonn Corporation requests that the attached information and materials being submitted to the FCC not be made available for public inspection.

Axonn makes this request on the basis that the material and information submitted contain technology which is the embodiment of certain Axonn pending patent rights, copyright, proprietary information, trade secrets and know how and that the disclosure of this information to the public would cause Axonn substantial competitive harm. Pursuant to Section 47 C.F.R. 0.459 below are the details and reasons regarding this request.

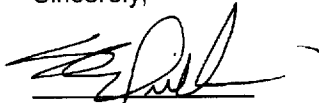
1. Confidential treatment is sought for: all information labeled 'Confidential' contained within the attached application for the transceiver device 'AX551' (hereinafter referred to as "AXONN INFORMATION"), namely:

Exhibit III	Theory of Operations
Exhibit IV	Block Diagrams
Exhibit V	Top Level Assembly Drawings & Documentation
Exhibit VI	RF Assembly Drawings & Documentation
Exhibit VII	Digital Assembly Drawings & Documentation
Exhibit VIII	Process Gain Calculations
2. This submission is made for the following reason: Application for Grant of Authorization of Equipment under Part 15.247.
3. AXONN INFORMATION contains technology which is the embodiment of certain Axonn pending patent rights, copyright, proprietary information, trade secrets and know how.
4. AXONN INFORMATION relates to a low-cost spread spectrum transceiver for use in the low data rate wireless communications market. A number of entities and companies are exploring similar technology for use in the cost sensitive and highly competitive wireless data communications market.
5. Axonn's techniques for achieving a reliable, low cost, compact size spread spectrum transceiver are proprietary and the safeguarding of this AXONN INFORMATION provides Axonn with a competitive advantage in the wireless data communications market. Axonn has gained a competitive edge over its competition by employing creative and functional circuit designs and production methods.
6. Axonn aggressively protects its proprietary information, all employees and consultants are required to execute and comply with Non Disclosure Agreements, all prospective customers are required to execute Non Disclosure Agreements before discussions or demonstrations of the AX551 are conducted. Axonn's standard purchasing agreement contains confidentiality provisions.

7. AXONN INFORMATION is not available to the public. Any disclosure of any portion of the AXONN INFORMATION to third parties takes place only if a Non Disclosure Agreement is in place.
8. AXONN INFORMATION should not be made available for a period of twenty years on the basis that the techniques embodied in the AXONN INFORMATION form a long term foundation for a low-cost spread spectrum enabling technology for low data rate wireless markets.
9. The primary business of Axonn Corporation is Research & Development for products in the highly competitive low cost, high volume, low data rate wireless communications market.

Enclosed is a check in the amount of \$1,075 made payable to the Federal Communications Commission, of which \$145 is the fee payable for this Confidentiality Request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Quillin', written over a horizontal line.

Scott Quillin  
Project Engineer