

December 6, 2001

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD
21046
USA

**REQUEST FOR NONDISCLOSURE OF INFORMATION SUBMITTED WITH
APPLICATION FOR EQUIPMENT AUTHORIZATION**

- The application in which disclosure appears is for Tag Tester and Configuration Tool, equipment identifier HE7TTG
- The documents requested to be kept undisclosed to the public are:
 - 1) 1 page, Schematic Doc No. 911-000046-000
 - 2) 5 pages, Bill of Materials Doc No. 600-000161-001 (ttct_bom.pdf)
 - 3) 1 page, Technical Description Doc No. tag_tester.pdf
- Disclosure compromises confidential information on proprietary communication protocols, jeopardizing a competitive advantage.
- The schematic and Bill of Materials are distributed to manufacturing firms that have signed non-disclosure agreements with EXI Wireless Systems Inc., to be used solely for the purpose of manufacturing product for EXI Wireless Systems Inc.
- Disclosure would allow the competitor to achieve the price advantage by bypassing the extensive research and design stages, as well as easing the task of reverse engineering.
- The schematic and Bill of Materials are not distributed to dealers or repair depots (EXI Wireless Systems Inc. provides all repairs at its own facilities).
- The Technical Description is written solely for regulatory submission.
- EXI Wireless Systems Inc. requests that the non-disclosure is maintained for 10 years.
- The HE7TTG product is not offered as a stand-alone consumer product and is marketed as an accessory for EXI Wireless Systems Inc. eLINK ENABLED RFID systems.
- Disclosure of the information may negatively affect the Halo System efficiency as a security device by providing a potential perpetrator with clues about the system's vulnerabilities.

Submitted by:


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