

Date:	August 19, 2019
Attention:	Application Examiner and Reviewing Engineer
Re:	Request for confidentiality of internal photos
Applicant:	Earth Science Systems, LLC FCC Grantee Code is: 2AP78 IC Company Code is: 24708
FCC ID: IC:	2AP78-US1 24708-US1

To whom it may concern:

Earth Science Systems, LLC (ESS) requests that certain portions of the application for equipment certification for the referenced FCC identifiers are permanently withheld from public disclosure. Specifically, with reference to FCC Rules Sections 0.457(d) and 0.459 for requesting confidentiality, the following sections of the application are requested to be kept confidential.

Exhibit Type	File Name
Schematics	ESS Utility Scanner - Schematics.pdf
Block Diagrams	ESS Utility Scanner - Block Diagrams.pdf
Operational and Functional Description	ESS Utility Scanner - Operational Description.pdf
Internal Photos	ESS Utility Scanner - Internal Photos.pdf

The rationale for request for confidentiality is that the information listed above is Trade Secret and is not normally released to anyone outside the company. ESS has invested considerable time and materials in research and development to produce the referenced product. Disclosure of the confidential portions of this application to competitors would not only give them significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by ESS.

If there are questions or further information is needed, please contact me at the number below. Thank you for your consideration of this matter.

Sincerely,

IL OTAN

Charles Oden President and CTO