

**Payne LLC  
The Neumours Bldg, Suite 1414  
Wilmington, Delaware 19801**

October 31, 2007

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

Re: **FCC ID No. UUU-L7E20070323**  
**FCC 47 CFR Part 15B**  
**Request for Confidential Treatment**

Ladies and Gentlemen:

Payne LLC ("Payne") requests that the information set forth in the following exhibits be withheld from public disclosure in accordance with Section 0.459 of the Commission's Rules, 47 C.F.R. § 0.459 (2005), following grant of the application. In support of this request, Payne submits the following:

Block Diagrams;  
Schematics;  
Parts List and Tune Up Procedure;  
Operational Description and  
Operational Description 2.

**(1) identification of the specific information for which confidential treatment is sought:**

The materials set forth in the exhibits referenced above, 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.: UUU-L7E20070323

**(3) explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:**

This material includes circuit diagrams and other technical details. As such, this material is treated as highly confidential business information since it contains key product details normally kept confidential by Payne and its affiliates.

**(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 radio communications equipment used by consumers in commercial mobile radio services, equipment that is offered on a highly competitive basis.

**(5) explanation of how disclosure of the information could result in substantial competitive harm:**

Disclosure would, in effect, give away the fruits of the labors of Payne and its affiliates' engineering personnel in the development of the equipment covered by this application. Disclosure would also offer competitors additional unwarranted insight into the state of product development and manufacturing thereby allowing such competitors an advantage that would not be available to Payne and its affiliates.

**(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 Payne and its affiliates 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 the application referenced in this letter, the information has not been disclosed publicly heretofore by Payne or its affiliates. The protection sought is narrowly drawn and pertains to certain specific implementations of the mobile radio technology described in the application.

**(8) justification of the period during which the submitting party asserts that material should not be available for public disclosure:**

This material should be kept confidential indefinitely. The equipment is a commercial product that will be offered for sale to the public. Even when improvements in design are made, disclosure of the original design information would lead to insights into both design and manufacturing techniques and could have an adverse competitive effect for many years to come. As such, it is important that the internal design details 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 or to compete unjustly in the production of similar equipment.

**(9) any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:**

See item 8 above.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephanie Burns", with a long horizontal flourish extending to the right.

Stephanie Burns  
President, Payne LLC