

# BUTZEL LONG

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*a professional corporation*

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December 4, 2018

Mr. Julius P. Knapp  
Chief Engineer, Office of Engineering and Technology  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: *Request for Confidential Treatment*

Dear Mr. Knapp:

Pursuant to Sections 0.457(d) and 0.459 of the Commission's Rules, Rohde & Schwarz USA, Inc. ("Rohde & Schwarz"), respectfully requests that the detailed description of its QPS 201 Personnel Security Scanner ("QPS 201 PSS") attached to its Waiver Request (being filed separately) be accorded confidential treatment by the Commission and withheld from public inspection. The detailed descriptions of the operating specifications contain proprietary trade secret commercially sensitive operational information that is not publicly disclosed by Rohde & Schwarz, and thus should be treated as confidential by the Commission. Moreover, disclosure of this information would cause competitive harm to Rohde & Schwarz by providing its competitors with detailed, non-public information on the operations of the QPS 201 PSS. Thus, the detailed information on the QPS 201 PSS should be exempt from public disclosure pursuant to Section 0.457(d) of the Commission's Rules.

Due to the sensitive nature of the information contained in the detailed description, and out of an abundance of caution, Rohde & Schwarz is also hereby requesting confidential treatment of this material pursuant to Section 0.459 of the Commission's Rules. Accordingly, grant of the instant request to withhold the attached materials from public inspection will serve the public interest, convenience and necessity.

December 3, 2018  
Mr. Julius P. Knapp  
Chief Engineer, Federal Communications Commission

Kindly direct any inquiries concerning this submission to the undersigned.

Very truly yours,

/s/

Stephen L. Goodman  
Counsel for Rohde & Schwarz USA, Inc.

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