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AN INTERNATIONAL INTELLECTUAL PROPERTY LAW FIRM

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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Sirs,

We are attorneys acting on behalf of Scantech International Pty Ltd ("Scantech").

A dispute has arisen between Scantech and one of its competitors.

Relevant to the dispute are the legal requirements, if any, for registering with the NRC neutron-based coal and/or cement bulk analyzers prior to operating, installing, transporting, selling, and offering for sale such analyzers in the USA.

Also relevant to the dispute are the earliest dates of registration with the NRC of neutron-based analyzers manufactured by Sabia, Inc., specifically Sabia's XC-5000 coal analyzer and XL-5000 cement analyzer products, and the earliest dates of installation of these analyzers at customer sites.

To assist us in our investigations, we are seeking the following information:

1. What is the earliest date of registration of Sabia, Inc.'s XC-5000 coal analyzer?
2. What is the earliest date of registration of Sabia, Inc.'s XL-5000 cement analyzer?
3. Is it a legal requirement to register a neutron-based materials analyzer with the NRC prior to (with all such actions being limited to the USA):
 - (i) operating the analyzer at a customer site?
 - (ii) installing the analyzer at a customer site?
 - (iii) transporting the analyzer to a customer site?
 - (iv) selling the analyzer to a customer?
 - (v) offering the analyzer for sale?

4. If the answer to all of 3(i) - (v) are in the negative, please let us know what impact, if any, registration has on the ability of a person to deal with a neutron-based analyzer in the USA.
5. Does the NRC have records documenting the date of installation/commissioning of such analyzers at customer sites, and if so, what are the earliest installation dates for the XC-5000 and XL-5000 analyzers?

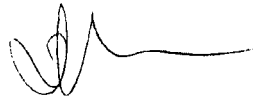
We have been informally advised that NRC approval of the XL-5000 analyzer would have been required before Sabia could legally sell the analyzer in the USA. We would be grateful if you could let us know whether this is correct.

Finally, if there are costs associated with this request, please let us know the amount of such a request.

We look forward to hearing from you as soon as possible.

With best regards,

Very truly yours,



Douglas P. Mueller

DPM/ajk