



Federated Wireless, Inc.
4075 Wilson Boulevard
9th Floor
Arlington, VA 22203
www.federatedwireless.com

October 29, 2019

VIA ECFS AND HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Request for Confidential Treatment
Federated Wireless, Inc. Report on Initial Commercial Deployment in the Citizens Broadband Radio Service
Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System (SAS) Administrator(s) and Environmental Sensing Capability (ESC) Operator(s) Applications, GN Docket No. 15-319

Dear Ms. Dortch:

Federated Wireless, Inc. (“Federated Wireless”) hereby submits the attached report (“ICD Report”) demonstrating the test results and compliance of its Citizens Broadband Radio Service (“CBRS”) Spectrum Access System (“SAS”) during the Federated Wireless Initial Commercial Deployment (“ICD”) reporting period from September 18, 2019 through October 21, 2019 in the above-captioned proceeding.¹ Pursuant to 47 C.F.R. §§ 0.457, 0.459, Federated Wireless requests confidential treatment for the company-specific, highly sensitive and proprietary commercial information in the attached ICD Report. The confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act and has been redacted from the version electronically filed with the Federal Communications Commission (“Commission”).

In support of this request and pursuant to Section 0.459(b) of the Commission’s rules, Federated Wireless hereby states as follows:

1. Identification of the specific information for which confidential treatment is sought.

Federated Wireless requests confidential treatment with respect to the confidential information contained in the ICD Report and redacted from the version filed electronically with the Commission.

¹ *Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System Initial Commercial Deployment Proposals*, GN Docket No. 15-319, Public Notice, DA 18-783 (WTB/OET 2018).

2. Identification of the circumstance giving rise to the submission.

Federated Wireless is providing its ICD Report in an open Commission proceeding in support of its application for certification as a CBRS SAS Administrator.

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.

The confidential information in the ICD Report is highly sensitive commercial information specific to the proprietary research, development, and strategies of Federated Wireless. This information is generally safeguarded from competitors and is not made available to the public.

4. Explanation of the degree to which the information concerns a service that is subject to competition.

The confidential information details the functioning of the Federated Wireless SAS and location of CBRS user sites, and Federated Wireless and other SAS Administrators will compete vigorously on the basis of the sensing and spectrum management services provided through their products.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of the redacted information could cause substantial competitive harm to Federated Wireless, because it would provide competitors insight into confidential research, development, operational, and strategic information that would not otherwise be available, which would work to Federated Wireless's severe competitive disadvantage.

6. Identification of any measures taken to prevent unauthorized disclosure.

Federated Wireless routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

Federated Wireless does not make the redacted information available to the public, and this information has not been previously disclosed to third parties.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

Federated Wireless requests that the redacted information be treated as being confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to Federated Wireless.

/s/ Jennifer M. McCarthy
Jennifer M. McCarthy
Vice President, Legal Advocacy
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RE: Federated Wireless, Inc. Report on Initial Commercial Deployment in the Citizens Broadband Radio Service
Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Five Spectrum Access System Administrators to Begin Initial Commercial Deployments in the 3.5 GHz Band, GN Docket No. 15-319

Dear Ms. Dortch:

Federated Wireless, Inc. (“Federated Wireless”) is pleased to submit this report (“ICD Report”) demonstrating the test results and compliance of its Citizens Broadband Radio Service (“CBRS”) Spectrum Access System (“SAS”) during the Federated Wireless Initial Commercial Deployment (“ICD”) reporting period from September 18, 2019 through October 21, 2019. This ICD Report demonstrates that the Federated Wireless SAS complies with the rules of the Federal Communications Commission (“Commission”) and with the requirements of the *ICD PN*, particularly those requirements and core functions described in Part 96, Subpart F of the Commission’s rules,¹ as well as those functions identified in the *ICD PN*:

- User Registration Process;
- SAS-Citizens Broadband Service Device Communications;
- Professional Installation;
- SAS-SAS Interoperability;
- SAS Utilization of Commission Databases;
- Dynamic Protection Area Protection;
- Incumbent Protection Implementation; and

¹ 47 C.F.R. Part 96, Subpart F.



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- Interference Reports and Mitigation.²

As this ICD Report demonstrates that the Federated Wireless SAS complies with the requirements of the Commission's rules, Federated Wireless respectfully requests that the Commission expeditiously conduct its review of this ICD Report and grant Federated Wireless final certification as a CBRS SAS Administrator. Doing so will enable full commercial launch of CBRS and bring the tremendous benefits of spectrum sharing and the already robust ecosystem for this band to market.

Should you have any questions regarding the foregoing or require additional information, please contact the undersigned.

Respectfully submitted,
/s/ Jennifer M. McCarthy
Jennifer M. McCarthy
Vice President, Legal Advocacy
Federated Wireless, Inc.
4075 Wilson Boulevard
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Arlington, VA 22203

Attachments

² See *Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System Initial Commercial Deployment Proposals*, GN Docket No. 15-319, Public Notice, DA 18-783, at para. 7 (WTB/OET 2018) ("ICD PN").

[REDACTED]