



March 13, 2019

VIA ELECTRONIC FILING AND HAND DELIVERY

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

RE: Request for Confidential Treatment
Performance Certification Results for a 3.5 GHz Environmental Sensing Capability
Sensor Provided for Testing by Federated Wireless, Inc.
GN Docket No. 15-319

Dear Ms. Dortch:

Federated Wireless, Inc. ("Federated Wireless") hereby submits the attached materials presenting the final report and results of performance certification testing and observations performed in October 2018 on Federated Wireless's Citizens Broadband Radio Service ("CBRS") Environmental Sensing Capability ("ESC") sensors 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 ESC sensor registration materials. The confidential information has been redacted from the version marked "REDACTED, FOR PUBLIC INSPECTION" and electronically filed with the Commission. In addition, the confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"). Certain portions of the confidential information also implicate operational security concerns for the U.S. Navy, and thus further merit confidential treatment by the 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 after the headings [*****BEGIN CONFIDENTIAL INFORMATION*****] and before the close headings [*****END CONFIDENTIAL INFORMATION*****] and redacted from the version marked "REDACTED, FOR PUBLIC INSPECTION" and filed electronically with the Commission.

¹ Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure for Registering Environmental Sensing Capability Sensors, GN Docket No. 15-319, Public Notice, DA 18-1054 (WTB/OET rel. Oct. 16, 2018).

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

Federated Wireless is submitting the final certification and performance testing results of its ESC sensors in an open Commission proceeding.

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 proposal and associated appendices 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 ESC in the CBRS, and Federated Wireless and other ESC operators will compete vigorously on the basis of the sensing and spectrum management services provided through these 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.

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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.

Respectfully submitted,
/s/ Jennifer M. McCarthy
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RE: Performance Certification Results for a 3.5 GHz Environmental Sensing Capability Sensor Provided for Testing by Federated Wireless, Inc., GN Docket No. 15-319

Dear Ms. Dortch:

Federated Wireless, Inc. (“Federated Wireless”) hereby submits the attached materials setting forth the results of performance certification testing conducted on its Citizens Broadband Radio Service (“CBRS”) Environmental Sensing Capability (“ESC”) sensor by the United States Department of Commerce, the Institute for Telecommunications Sciences (“ITS”), and the National Telecommunications and Information Administration in October 2018. This testing was conducted by ITS pursuant to a Cooperative Research and Development Agreement between ITS and Federated Wireless.

Federated Wireless submits the attached report and results in support of its application for final certification as a CBRS ESC Operator.¹ As noted in the attached report, the Federated Wireless ESC “passed all certification tests and observations” and “no problems or deficiencies were noted in any of the certification tests and observations that were performed.”²

Should you require any further information regarding the Federated Wireless ESC sensors described in the attached materials, please contact the undersigned and Emerino Marchetti at emarchetti@federatedwireless.com.

Respectfully submitted,
/s/ Jennifer M. McCarthy
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¹ See *Wireless Telecommunications Bureau and Office of Engineering and Technology Conditionally Approve Four Environmental Sensing Capability Operators for the 3.5 GHz Band*, GN Docket No. 15-319, Public Notice, DA 18-172 (WTB/OET rel. Feb. 21, 2018).

² Frank Sanders *et al.*, U.S. Dep’t of Commerce, ITS, and Nat’l Telecomms. and Info. Admin., *Performance Certification Results for a 3.5 GHz Environmental Sensing Capability (ESC) Sensor Provided for Testing by Federated Wireless, Inc.*, Final Report, at 25 (Feb. 28, 2019).



Performance Certification Results for a 3.5 GHz Environmental Sensing Capability (ESC) Sensor Provided for Testing by Federated Wireless, Inc.

February 28, 2019
Final Report

Prepared by:

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Rebecca Dorch, and Christopher Redding

This document presents project information to a sponsor. It has not been formally released and is not a referenceable document.

[REDACTED]