



Federated Wireless, Inc.  
 3865 Wilson Boulevard  
 Suite 200  
 Arlington, VA 22203  
 www.federatedwireless.com

June 10, 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 Spectrum Access System (SAS)*  
*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 summary results (“Report Card”) of performance certification testing and observations performed on Federated Wireless’s Citizens Broadband Radio Service (“CBRS”) Spectrum Access System (“SAS”) in the above-captioned proceeding.<sup>1</sup>

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 Report Card. 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.

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<sup>1</sup> See *Wireless Telecommunications Bureau and Office of Engineering and Technology Conditionally Approve Seven Spectrum Access System Administrators for the 3.5 GHz Band*, GN Docket No. 15-319, Public Notice, DA 16-1426 (WTB/OET rel. Dec. 21, 2016).

Federated Wireless, Inc.  
June 10, 2019

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

Federated Wireless is submitting its Report Card in support of its application for final certification as a CBRS SAS Administrator 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 Report Card 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 Federated Wireless and other SAS Administrators will compete vigorously on the basis of the interference analysis 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.

Federated Wireless, Inc.  
June 10, 2019

**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  
Jennifer M. McCarthy  
Vice President, Legal Advocacy  
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Arlington, VA 22203



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**RE: Performance Certification Results for a 3.5 GHz Spectrum Access System 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 summary results (“Report Card”) of laboratory certification testing conducted on its Citizens Broadband Radio Service (“CBRS”) Spectrum Access System (“SAS”) by the United States Department of Commerce, National Telecommunications and Information Administration (“NTIA”), Institute for Telecommunications Sciences (“ITS”). This testing was conducted by ITS pursuant to a Cooperative Research and Development Agreement (“CRADA”) between ITS and Federated Wireless, which CRADA provides for the voluntary submission by Federated Wireless to the Federal Communications Commission (“Commission”) of SAS Test Results such as the Report Card.

Federated Wireless submits the attached Report Card in support of its application for final certification as a CBRS SAS Administrator.<sup>1</sup> This Report Card should enable the Commission, NTIA, and the United States Department of Defense to initiate review of the results of laboratory testing of the Federated Wireless SAS while ITS prepares the Federated Wireless SAS Final Test Report, which is still in process.

As noted in the attached Report Card, and the accompanying report developed by Federated Wireless, for each test case where the actual test result(s) for the SAS matched the expected result(s), the software test harness logged such a result as “OK.” Where the actual test result(s) for the SAS did not match the expected result(s), ITS staff manually assessed whether the actual result indicated a compliance issue in the SAS’s performance or was a result of limitations in the test harness. For the over 1,000 tests performed by ITS, Federated Wireless observes that the SAS generated an “OK” result or the SAS demonstrated compliance notwithstanding the limitations of the test harness. Federated Wireless concurs with the test results generated by the ITS testing, which demonstrate that the Federated Wireless SAS passed all tests.

Upon receipt of its full Final Test Report, Federated Wireless will supplement this submission with such materials to enable the Commission to expeditiously continue its review

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<sup>1</sup> See *Wireless Telecommunications Bureau and Office of Engineering and Technology Conditionally Approve Seven Spectrum Access System Administrators for the 3.5 GHz Band*, GN Docket No. 15-319, Public Notice, DA 16-1426 (WTB/OET rel. Dec. 21, 2016).

Federated Wireless, Inc.  
June 10, 2019

and approval of the Federated Wireless application for final certification as a CBRS SAS Administrator.

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

Respectfully submitted,  
/s/ Jennifer M. McCarthy  
Jennifer M. McCarthy  
Vice President, Legal Advocacy  
Federated Wireless, Inc.  
3865 Wilson Boulevard  
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Attachments

**[REDACTED]**