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Mountain View, CA 94043

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**REDACTED FOR PUBLIC INSPECTION**

June 12, 2019

**Via Electronic Filing**

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

**Re: Performance Certification Results for 3.5 GHz Environmental Sensing Capability  
Sensor of Google LLC (GN Docket No. 15-319)**

Dear Ms. Dortch:

Google LLC (Google) hereby submits summary results (Report Card) of laboratory certification testing conducted on its Citizens Broadband Radio Service (CBRS) Spectrum Access System (SAS) by the Commerce Department's Institute for Telecommunications Sciences (ITS). Pursuant to 47 C.F.R. §§ 0.457, 0.459, Google requests confidential treatment for the Report Card, which has been marked "REDACTED, FOR PUBLIC INSPECTION" and electronically filed with the Commission.

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, Google hereby states as follows:

**1. Identification of the specific information for which confidential treatment is sought.** Google requests confidential treatment with respect to the confidential information in the Report Card, which is redacted from the version marked "REDACTED, FOR PUBLIC INSPECTION" and filed electronically with the Commission.

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

contains and reveals highly sensitive commercial information specific to Google's SAS. 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 Google's SAS. Google 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 Google, because it would provide competitors insight into confidential research, development, operational, and strategic information that would not otherwise be available, which would work to Google's severe competitive disadvantage.

**6. Identification of any measures taken to prevent unauthorized disclosure.** Google 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.** The redacted information and the product information it reflects is not available to the public, and this information has not been previously disclosed to third parties.

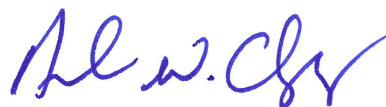
**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.** Google requests that the redacted information be treated as being confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to Google.

Please let us know if you have any questions about this submission.

Respectfully submitted,



Megan Anne Stull  
Counsel



Andrew W. Clegg  
Spectrum Engineering Lead  
Google LLC



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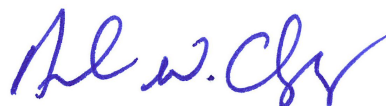
Google LLC (Google) hereby submits summary results (Report Card) of laboratory certification testing conducted on its Citizens Broadband Radio Service (CBRS) Spectrum Access System (SAS) by the Commerce Department's Institute for Telecommunications Sciences (ITS). This testing was conducted by ITS pursuant to a Cooperative Research and Development Agreement between ITS and Google. Subsequent to ITS's laboratory testing of Google's SAS, but prior to issuance of the full lab test report, Google received an initial Report Card, which shows that Google's SAS passed all laboratory tests. While these results are preliminary and are subject to details provided in the full test report, we submit the Report Card to the Commission for completeness.

Please let us know if you have any questions about this submission.

Respectfully submitted,

A handwritten signature in blue ink that reads "Megan Anne Stull". The signature is written in a cursive, flowing style.

Megan Anne Stull  
Counsel

A handwritten signature in blue ink that reads "Andrew W. Clegg". The signature is written in a cursive, flowing style.

Andrew W. Clegg  
Spectrum Engineering Lead  
Google LLC

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