

June 13, 2019

VIA ECFS

Wireless Telecommunications Bureau  
Office of Engineering Technology  
Federal Communications Commission  
441 12<sup>th</sup> Street, SW  
Washington, DC 20006

Re: Sony Corporation Spectrum Access System  
Second Amendment to Initial Commercial Deployment Proposal  
GN Docket 15-319

To whom it may concern:

Sony Corporation (“Sony”) submits the following second amendment to its proposal for Initial Commercial Deployment (“ICD”) of its Spectrum Access System (“SAS”), which was submitted in the above-referenced proceeding on September 10, 2018, and which was initially amended on April 12, 2019.

Pursuant to Section 0.459 of the Commission’s rules, Sony requests confidential treatment for this second amendment, as it did for the original proposal and for the initial amendment. This second amendment includes commercial information and trade secrets regarding the implementation details of Sony’s ICD proposal, and public disclosure would undermine Sony’s ability to offer a competitive SAS. This information has not previously been shared outside of Sony, including to the public or to third parties. Sony asks that its original ICD submission and both amendments remain confidential until the proposal as amended has been approved and implemented, at which point any potential for competitive harm will no longer exist. Alternatively, Sony asks that the Commission return this filing if this request for confidentiality is denied. Sony consents to the sharing of its non-redacted response with other Federal government agencies.

Please contact the undersigned with any questions about this submission or confidentiality request.

Respectfully submitted,

/s/ \_\_\_\_\_  
James Morgan  
Director and Counsel  
Sony Electronics Inc.  
james.morgan@sony.com