



July 19, 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 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 (“Final SAS Test Report”) of performance certification testing and observations performed on Federated Wireless’s Citizens Broadband Radio Service (“CBRS”) Spectrum Access System (“SAS”) 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 Final SAS Test Report. 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 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).

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

Federated Wireless is submitting the Final SAS Test Report 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 Final SAS Test 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 in the CBRS, and Federated Wireless and other SAS operators 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.

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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
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 results of performance certification testing (“Final SAS Test Report”) 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 between ITS and Federated Wireless.

Federated Wireless submits the attached Final SAS Test Report, and Federated Wireless’s comments thereto, in support of its application for final certification as a CBRS SAS Administrator.¹ As noted in the Final SAS Test Report, ITS determined that Federated Wireless passed all tests. This Final SAS Test Report will enable the Federal Communications Commission, NTIA, and the Department of Defense to expeditiously conduct their review of the results of laboratory testing of the Federated Wireless SAS and enable Federated Wireless and its numerous customers and partners to enter into Initial Commercial Deployment.

Should you require any further information regarding the Federated Wireless SAS described in the Final SAS Test Report, 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, Suite 200
 Arlington, VA 22203

Attachments

¹ 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).

[REDACTED]