

REDACTED FOR PUBLIC INSPECTION

July 24, 2019

VIA ECFS AND HAND DELIVERY

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

Re: Spectrum Access System Certification Test Report for
FCC Part 96 Conformance for Sony Corporation
GN Docket No. 15-319

Dear Ms. Dortch:

Sony Corporation (“Sony”) respectfully submits its “Spectrum Access System Certification Test Report for FCC Part 96 Conformance,” with appendices, in support of its application to serve as a Citizens Broadband Radio Service Spectrum Access System (“SAS”) administrator. Sony has previously received conditional authorization to serve as a SAS administrator,¹ and is pleased to report that the Sony SAS successfully passed all tests in this next step toward final certification.

Pursuant to Section 0.459 of the Commission’s rules, Sony requests confidential treatment for Attachment A and Attachment B of this letter, which Sony is submitting in GN Docket No. 15-319. These attachments include highly confidential test results, the public disclosure of which would reveal Sony trade secrets and proprietary research and development matters, and would in turn undermine Sony’s ability to offer a competitive SAS. Sony expects that the Commission will grant final approval to multiple SAS administrators, and that provision of this service will be highly competitive. Sony treats this information as confidential, and has not previously released it to the public or to third parties. Sony asks that this submission be kept confidential indefinitely, because disclosure at any future point in time would result in competitive harm. Alternatively, Sony asks that the Commission return this filing if this request for confidentiality is denied. For avoidance of doubt, Sony consents to the sharing of its non-redacted submission with other Federal government agencies.

¹ See *Wireless Telecommunications Bureau and Office of Engineering and Technology Conditionally Approve Seven Spectrum Access System Administrators for the 3.5 GHz Band*, Public Notice, 31 FCC Rcd 13355 (WTB/OET 2016).

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

Respectfully submitted,

/s/

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Director and Counsel

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Attachments

REDACTED FOR PUBLIC INSPECTION

Attachment A

Spectrum Access System Certification
Test Report for FCC Part 96 Conformance

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Attachment B

Spectrum Access System Certification
Test Report Appendices

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