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

Re: Request for Confidential Treatment

**Proposal to Conduct a Public Field Trial and for Initial Commercial Deployment,
GN Docket No. 15-319**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §§ 0.457, 0.459, Key Bridge requests confidential treatment for certain information provided in the enclosed proposal be withheld from public inspection and afforded confidential treatment in accordance with Section 552(b)(4) of the Freedom of Information Act, 5 U.S.C. § 552(b)(4), and Sections 0.457(d)(2) and 0.459(b) of the Commission's Rules, 47 C.F.R. §§ 0.457(d)(2), 0.459(b).

In accordance with Section 0.459(b) of the Commission's Rules, this request is supported by the following statements:

(1) Identification of Specific Information for Which Confidential Treatment is Sought (Section 0.459(b)(1)).

Key Bridge requests confidential treatment with respect to the commercial information contained on pages marked "Confidential – Not for Public Inspection". Specifically, Key Bridge seeks confidential treatment for information provided in Section 4 of the attached proposal.

(2) Description of Circumstances Giving Rise to Submission (Section 0.459(b)(2)).

The confidential information is a required supplement to our CBRs SAS Administrator Proposal.¹ The information is submitted in response to a Commission Public Notice in the above referenced proceeding.²

(3) Explanation of the Degree to Which the Information is Commercial or Financial, or Contains a Trade Secret or is Privileged (Section 0.459(b)(3)).

The confidential information includes proprietary and sensitive commercial information about new services being developed by Key Bridge, product development strategies, solution development and integration offerings and unique implementation approaches. This type of commercial information is generally closely held and considered commercial confidential and Key Bridge does, in fact, protect and keep such information confidential. See 5 U.S.C. §552(b)(4).

Disclosure of the confidential information could have a significant impact on Key Bridge's commercial operations by enabling competitors to discover Key Bridge's future business plans and enable such competitors to unfairly benefit from Key Bridge market research, product development and commercial marketing.

(4) Explanation of the Degree to Which the Information Concerns a Service that is Subject to Competition (Section 0.459(b)(4)).

Companies seeking Commission approval to operate as SAS Administrators aggressively compete on the basis of minor product and feature differentiations. Other SAS Administrators and operators will compete vigorously to provide similar services.

(5) Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5)).

Disclosure of the redacted information could cause substantial competitive harm to Key Bridge. The commercially sensitive information for which Key Bridge seeks confidential treatment includes proprietary and sensitive commercial information about new services being developed by Key Bridge and Key Bridge customers, service integration strategies, plus research, development and strategic market development information that Key Bridge would not otherwise share with an external party. Some of the approaches disclosed include potentially patentable methods and practices. Disclosure of the confidential information could have a significantly negative impact on Key Bridge's commercial

1 See *Key Bridge Proposal to Administer a Spectrum Access System* ("Key Bridge SAS Proposal"), GN Docket 15-319 received 05/13/16 at <https://ecfsapi.fcc.gov/file/60001841834.pdf>

2 See *Wireless Telecommunications Bureau And Office Of Engineering And Technology Establish Procedure And Deadline For Filing Spectrum Access System Initial Commercial Deployment Proposals*, DA 18-738, GN Docket No. 15-319, Released July 27, 2018

operations by granting competitors insight into Key Bridge product research, marketing strategies, business development plans and approaches for customer acquisition. Disclosure could enable competitors to nullify competitive advantages of Key Bridge.

(6) Identification of Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b))

Key Bridge treats the redacted information as highly proprietary and confidential. None of the information Key Bridge seeks to protect is publicly available. Key Bridge exercises significant care to ensure that proprietary information is protected by non-disclosure agreement, is compartmentalized between clients and not disclosed to competitors or to the public.

(7) Identification of Whether the Information is Available to the Public and the Extent of Any Previous Disclosure of Information to Third Parties (Section 0.459(b)(7)).

None of the information for which Key Bridge seeks confidential treatment has been provided to the public. Key Bridge does not share the information with the public or with third parties.

Compartmentalized subsets of the information are shared with contracted partners subject to strict non-disclosure agreements.

(8) Justification of Period During Which the Submitting Party Asserts that the Material Should Not be Available for Public Disclosure (Section 0.459(b)(8)).

Key Bridge requests the Commission withhold the redacted information from public inspection indefinitely. Key Bridge would not provide this information to the public in any foreseeable normal course of our business.

Respectfully submitted,

/s/ Jesse Caulfield

Jesse Caulfield, CEO

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