



August 22, 2011

Via E-mail

Mr. Julius Knapp  
Federal Communications Commission  
445 Twelfth Street, SW, TW-A325  
Washington, DC 20554

**Re: REQUEST FOR CONFIDENTIAL TREATMENT  
LightSquared Subsidiary LLC  
IB Docket 11-109  
File No. SAT-MOD-20101118-00239**

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Dear Mr. Knapp:

At the request of the Office of Engineering and Technology,<sup>1</sup> LightSquared Subsidiary LLC (“LightSquared”), hereby submits a “Base Station Deployment Plan” as a supplement to the Final Report of the Working Group (June 30, 2011) (“Final Report”) and requests confidential treatment of this information. The Base Station Deployment Plan provides information regarding site locations, antenna heights and orientation of the sites that LightSquared has tentatively selected for the initial phase of deployment for the terrestrial component of its integrated network. Because the Base Station Deployment Plan provides technical and commercially sensitive information regarding LightSquared’s network and business plan, LightSquared requests confidential treatment of the Base Station Deployment Plan.<sup>2</sup>

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<sup>1</sup> See Letter to Jeffrey Carlisle, Executive Vice President, LightSquared Subsidiary LLC, and Charles R. Trimble, Chairman, U.S. GPS Industry Council from Julius P. Knapp, Chief, Office of Engineering and Technology, FCC (August 10, 2011).

<sup>2</sup> See 5 U.S.C. § 552 *et seq.*; 47 C.F.R. §§ 0.457, 0.459. Because the entire attached Base Station Deployment Plan contains sensitive information regarding LightSquared’s deployment plans and technical operations, no redacted version of this filing is being submitted.

In conformity with Section 0.459(b) of the Commission's rules, 47 C.F.R. § 0.459(b), LightSquared submits the following:

(1) *Identification of the Specific Information for Which Confidential Treatment is Sought.*

LightSquared requests confidential treatment of the attached Base Station Deployment Plan, which provides commercially sensitive information regarding site locations, antenna heights and orientation of the sites that LightSquared has tentatively selected for the initial phase of deployment for the terrestrial component of its integrated network.

(2) *Description of Circumstances Giving Rise to Submission.* LightSquared is providing the Base Station Deployment Plan pursuant to a request by the Office of Engineering and Technology.<sup>3</sup>

(3) *Explanation of the Degree to Which the Information is Commercial or Financial, or Contains a Trade Secret or is Privileged.* The Base Station Deployment Plan contains confidential technical and commercial information regarding LightSquared's buildout plan that is not made available to the public or to competitors. Disclosure of the Base Station Deployment Plan would reveal that confidential information.

(4) *Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm.* Disclosure of the Base Station Deployment Plan could result in substantial competitive harm to LightSquared by making public detailed, commercially sensitive information regarding its network buildout plans.

(5) *Identification of Any Measures Taken to Prevent Unauthorized Disclosure, and Identification of Whether the Information is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties.* The Base Station Deployment Plan has been kept strictly confidential by LightSquared and its commercial partners and has not been released to the public. Where information has been shared with partners, the relevant parties executed confidentiality agreements.

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<sup>3</sup> See Letter to Jeffrey Carlisle, Executive Vice President, LightSquared Subsidiary LLC, and Charles R. Trimble, Chairman, U.S. GPS Industry Council from Julius P. Knapp, Chief, Office of Engineering and Technology, FCC, at 2 (August 10, 2011).

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(6) *Justification of the Period During Which the Submitting Party Asserts that the Material Should Not be Available for Public Disclosure.* There is no public benefit to be derived from disclosure of the Base Station Deployment Plan. General information regarding LightSquared's technical operations needed by GPS manufacturers and other interested parties to study technical issues related to performance of GPS receivers in the presence of LightSquared's planned operations was disclosed as part of the Working Group process. The Base Station Deployment Plan provides detailed, sensitive location information regarding specific base station sites, and should be permanently withheld from public disclosure.

Please contact the undersigned if you should have any questions regarding this matter.

Respectfully submitted,

/s/ Jeffrey Carlisle

Jeffrey Carlisle

*Executive Vice President for Regulatory Affairs and  
Public Policy, LightSquared*

Enclosure (Confidential)

cc: Ronald Repasi