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January 2, 2019

#### **CONFIDENTIAL MATERIALS ATTACHED**

Federal Communications Commission Office of Engineering and Technology Experimental Licensing Branch Washington, DC 20554

#### Re: REQUEST FOR CONFIDENTIAL TREATMENT

#### **Application for Experimental Special Temporary Authority by AT&T Services, Inc.** 0002-EX-ST-2019

Pursuant to Section 0.459 of the Commission's Rules, 47 C.F.R. § 0.459, AT&T Services, Inc. ("AT&T"), by its counsel, respectfully requests that the enclosed submission in 0002-EX-ST-2019 be withheld from public inspection and afforded confidential treatment in accordance with Section 4(j) of the Communications Act, 47 U.S.C. § 154(j), and Sections 0.457(c)(1) and 0.459(b) of the Commission's Rules, 47 C.F.R. §§ 0.457(c)(1), 0.459(b). Accordingly, the enclosed submission is labeled "Confidential – Not for Public Inspection."

Section 4(j) of the Communications Act provides, in part, that "The Commission is authorized to withhold publication of records or proceedings containing secret information affecting the national defense." 47 U.S.C. § 154(j). Section 0.457(c)(1) of the Commission's Rules allows persons submitting materials that they wish withheld from public inspection in accordance with Section 154(j) to file a request for non-disclosure. 47 C.F.R. § 0.457(c)(1). The requirements governing such requests are set forth in Section 0.459(b) of the Commission's rules.

This Submission is being made voluntarily. If any request for inspection is received by the Commission and/or if this request for confidentiality should be denied, AT&T requests that the Commission provide AT&T with the opportunity to request return of these materials to AT&T without consideration, in accordance with Section 0.459(e) of the Commission's rules.

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

#### **1.** Identification of the specific information for which confidential treatment is sought:

AT&T seeks to maintain confidentiality of the Narrative Attachment to application file number 0002-EX-ST-2019, including the appendix labeled APPENDIX ANTENNA SITE

INFORMATION and marked "Confidential – Not for Public Inspection" (collectively "the Confidential Submission").

## 2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The Confidential Submission is being submitted in connection with an experimental license application (0002-EX-ST-2019) submitted by AT&T Services, Inc.

### **3.** Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The Confidential Submission contains information that, if disclosed, would raise significant threats to national security.

### 4. Explanation of the degree to which the information concerns a service that is subject to competition:

The confidential information concerns a service that is subject to competition.

### 5. Explanation of how disclosure of the information could result in substantial competitive harm:

As noted above, the Confidential Submission contains information affecting the national defense. Disclosure of the confidential information could result in harm to national security of the United States.

## 6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

AT&T keeps this kind of sensitive national security information confidential and does not make it publicly available.

# 7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

As described above, none of the information in the Confidential Submission for which AT&T seeks confidential treatment has been provided to the public.

## 8. Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

AT&T respectfully requests that the Commission withhold the Confidential Submission from public inspection indefinitely. AT&T would not, in the normal course of business, provide this information to the public.

If you should have any questions or need further information, please contact the undersigned counsel for AT&T.

Respectfully submitted,

/s/ Michael P. Goggin

Michael P. Goggin AT&T Services, Inc.

Enclosures cc: