

# STA Confidentiality Exhibit Reasoning

Area-I, Inc.

## 9 Subsections of Part 0.459(b) of the FCC's Rules

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

Under the "Explanation" section of the STA application, Area-I would like to withhold the contract number provided.

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

The information was submitted to the FCC via a "Special Temporary Authority" application.

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

This is DoD ITAR (sensitive) information that Area-I does not want linked directly with our company, as it poses both security and competitive risks.

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

By linking this contract number with this application, our competition and adversaries can easily identify our technology implementation and act maliciously.

### **4.) Explanation of how disclosure of the information could result in substantial competitive harm**

Inclusion of this information can be utilized to identify the hardware and frequencies of operation along with the contract number. This allows for an extrapolation of a contract solution, which can lead to security concerns for the Department of Defense. This also provides our competition with an advantage on current and future contracts.

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

Area-I takes countless precautions to protect its intellectual property, one precaution being to release minimal public information. Specifically, Area-I strives to maintain the trade secrets utilized to perform our missions. This is often done by mitigating where sensitive information can be accessed, especially implementation details.

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

The contract information along with our name is publicly available, but none of this is linked to a specific technology implementation. Area-I would like to prevent the contract number from being accessible via the STA.

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

September 28, 2022 (contract completion date)

### **9.) Any information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.**

Available contract information: <https://www.defense.gov/Newsroom/Contracts/Contract/Article/1328736/>

**Note\*** This source does not contain any details regarding the technology implementation; hence Area-I would like to withhold the contract number from the STA.