

Request for Confidentiality

6 June 2018

Blue Origin Texas, LLC

Re: FCC file # 1025-EX-ST-2018

Pursuant to 47 CFR 0.457(d) and 47 CFR 0.459, Blue Origin, LLC (“Blue Origin”) requests that the confidential information submitted as part of this license request (the “Confidential Materials”) not be placed in the public file, and otherwise withheld from public inspection.

(1) Identification of the specific information for which confidential treatment is sought:

The Confidential Materials consist of:

- Exhibit 1 – Information about FCC license request for Flight 9
- Exhibit 2 – New Shepard Flight 9 Overview

(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 Materials are being submitted as part of Blue Origin Texas’s request for Special Temporary Authority (FCC file # 1025-EX-ST-2018) for Flight 9 of the New Shepard suborbital launch vehicle, as part of the flight test program of that vehicle.

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The Confidential Materials contain specific proprietary commercial and technical information related to both the design of the New Shepard vehicle and its flight test program.

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

The New Shepard suborbital launch vehicle and associated services are subject to substantial competition from other commercial companies in both the research payload and human spaceflight markets. The Confidential Materials contain proprietary details about this launch vehicle and its flight test program.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Public disclosure of the Confidential Materials could enable unfair competition by giving other commercial companies sensitive details about the design and flight test program of the New Shepard vehicle. Accordingly, such disclosure is likely to cause irreparable competitive harm to Blue Origin, and the information is thus exempted from mandatory public disclosure under 47 CFR 0.457(d).

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

Blue Origin has taken substantial measures to prevent unauthorized disclosure of the Confidential Materials, including but not limited to marking the materials “Proprietary and Confidential” or similar and transmitting the materials only to parties bound under specific non-disclosure agreements (NDAs). These or related materials submitted to other U.S. Government agencies

have also been transmitted under similar restrictions.

(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 of the date of this submission, to the best of the applicant's knowledge, the information contained in the Confidential Materials is not currently available to the public, and Blue Origin does not intend for the information to be released for unlimited distribution. The information has only been disclosed to U.S. Government agencies under confidentiality for licensing purposes, and among Blue Origin related entities such as subsidiaries, employees, and contractors on a need-to-know basis and subject in each case to a non-disclosure obligation.

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

Blue Origin requests that "Exhibit 1 – Information about FCC license request for Flight 9" be withheld from public disclosure for a period of one (1) year from the date of this submission. This non-disclosure period is necessary to protect Blue Origin's commercial interests in the nature of its flight test program.

Blue Origin requests that "Exhibit 2- New Shepard Flight 9 Overview" be withheld from public disclosure for an indefinite period, or for the maximum permissible time. Blue Origin has expended substantial resources to organize its business and develop its proprietary design information. Blue Origin has also taken substantial and ongoing measures to safeguard its sensitive information, including the information contained in this exhibit. Blue Origin does not intend for the information contained in this exhibit to be released to the public.

(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:

N/A.

If you require addition information, please contact Nancy Newell at 253-437-5676 or via email at nnewell@blueorigin.com.

Sincerely,

Jeffrey Bridge
Avionics Engineer