

01/29/19

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. NW  
Washington DC 20554

**Re: Request for Confidential Treatment of Material Filed  
Application : 0035-EX-CN-2019**

FILED ELECTRONICALLY

Dear Ms. Dortch:

Cisco Systems requests, per Section 0.459 of the Commission's rules, confidential treatment of material filed in support of the above-referenced application. Cisco submits the following in conformance with the requirements of Section 0.459(b) of the Commission's rules:

1. Identification of the specific information for which confidential treatment is sought.
  - Description of radio system
  - Name of vendor of product
2. Identification of the Commission proceeding in which the information was submitted.
  - OET Experimental License Application File
3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.
  - The information is a commercial trade secret.
4. Explanation of the degree to which the information concerns a service that is subject to competition.
  - Ground surveillance radar is available from a number of vendors

5. Explanation for how disclosure of the information could result in substantial competitive harm.
  - The information contained in the document presents information about a conceptual product that is being evaluated for possible commercial development. If competitors were to have access to this document, they would have knowledge of Cisco's pending business plans, and potentially would be able to use this advance knowledge to their advantage. This could result in substantial competitive harm to Cisco's ability to bring a product to market, should that decision be made.
  
6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure.
  - Cisco manages its product development to ensure that competitors do not get early access to details about forthcoming products. Information about Cisco's products under development including engineering development or demonstration tools is considered by the company to be commercially sensitive information that employees are not permitted to discuss outside the company.
  
7. Identification of whether the information is available to the public and the extent of any previous disclosure of information to third parties.
  - Information about product development is not routinely provided to the public, and is not available on Cisco's website. No information about this product has been disclosed.
  
8. Justification of the period during which the submitting party asserts that material should not be available for public disclosure.
  - Cisco requests that the above-identified material not be disclosed for 1 year. This period should provide sufficient time for Cisco to make its evaluation of the product.
  
9. Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.
  - Cisco has not offered a comparable solution in the marketplace in the past. Even the knowledge that Cisco is evaluating market entry, and has obtained a Experimental License, would be valuable market information for existing solution providers.

Sincerely,

David Case

