



Date: October 13, 2020
Subject: Request for Confidentiality
FCC File Number: 0854-EX-CN-2020

Garmin International ("Garmin"), pursuant to 5 U.S.C. § 552 and Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§ 0.457, 0.459, hereby requests that certain information complementary to its above-referenced experimental license application ("Application") be treated as confidential and not subject to public inspection. The designated information constitutes confidential and proprietary information that, if subject to public disclosure, would cause significant commercial, economic, and competitive harm. As described below, Garmin's request satisfies the standards for grant of such requests set forth in Sections 0.457 and 0.459 of the Commission's Rules.

In accordance with Section 0.459(b) and in support of this request, Garmin provides the following information:

Identification of the Information for Which Confidential Treatment is Sought.

Garmin seeks confidential treatment for the unredacted/non-public versions of the following exhibits (together the "Exhibits"):

1. Exhibit A – Narrative Statement
2. Exhibit B – Technical Characteristics
3. Exhibit C - Aggregate Interference Analysis And Correspondence

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

The above-referenced Exhibits were submitted to the Commission in support of the Application. These Exhibits were filed with the Office of Engineering and Technology on October 13, 2020. For additional information, please see File No. 0854-EX-CN-2020.

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

The information in the Exhibits contain confidential and proprietary commercial and prospective information related to technical partners and/or customers that is not routinely available for public inspection and is not made publicly available in the ordinary course of business. This information therefore qualifies for protection pursuant to Commission rules and the Administrative Procedure Act.

Explanation of the degree to which the information concerns a service that is competitive.

The services and technologies that are the subject of the Exhibits are subject to fierce competition from multiple U.S. and non-U.S. third parties. The services and technologies that are the subject of the Exhibits also touch upon services and technologies that Garmin is continuing to develop, and that are expected to lead to material developments in markets subject to fierce competition from multiple U.S. and non-U.S. third parties.

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

The Exhibits contain sensitive commercial information. Disclosure of the information contained in the Exhibits would provide valuable insight into Garmin's business plans and strategies and cause substantial harm to Garmin's competitive position.

Identification of any measures taken by the requesting party to prevent unauthorized disclosure.

The Exhibits contain sensitive commercial information that would not otherwise be released to third parties.

Identification of whether the information is available to the public and the extent of any previous disclosures of the information to any third parties.

The information contained in the Exhibits is not available to the public, and has only been disclosed as necessary to limited third parties involved with Garmin under the expectation of confidentiality. Furthermore, those third parties may also have claims to assert that the information contained therein is confidential.

Justification of the requested period of confidentiality

Garmin requests that the Commission hold the Exhibits and information contained therein out of public view for an indefinite period of time. Release of this information may cause substantial harm to Garmin for the reasons set forth herein.

Any other information that would be useful in assessing whether this request should be granted.

The information subject to this Request for Confidentiality should not be made available for public disclosure at any time. Public disclosure of the sensitive information in the Exhibits after the Commission has ruled on the Request for Confidentiality is not necessary for the Commission to fulfill its regulatory responsibilities.

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Due to the competitively sensitive nature of the information contained in the Exhibits, Garmin respectfully requests that the Commission treat the Exhibits as confidential and withhold the same from public inspection. In the event that the Commission denies this request for Confidentiality, Garmin requests that the Exhibits be returned without consideration pursuant to Section 0.459(e).

Sincerely yours,

/s/

Bronson Hokuf
Garmin International

Exhibit A Narrative

Introduction

Pursuant to Sections 5.3(j) and 5.54(a)(1) of the Federal Communications Commission's (the "Commission's") Rules, Garmin International ("Garmin") requests that the Commission grant a two-year experimental license for an indoor Global Positioning System ("GPS") re-radiation system to facilitate the design and testing of GPS receivers at its global headquarters. In support, Garmin provides this narrative.

**_*_*_

Garmin Background

Garmin is a global manufacturer of GPS navigation technology for, among others, the automotive, aviation, and marine industries. The product range of GPS-based devices Garmin manufactures is unparalleled in its diversity. This range includes: wearable devices of an increasingly sophisticated nature used for both professional and recreational activities; handheld mobile satellite terminals; many different classes of automotive navigation aids, including devices for fleet telematics; maritime navigation devices; and some of the world's most sophisticated certified aviation products for general aviation, business aircraft, government and defense solutions, as well as helicopters.

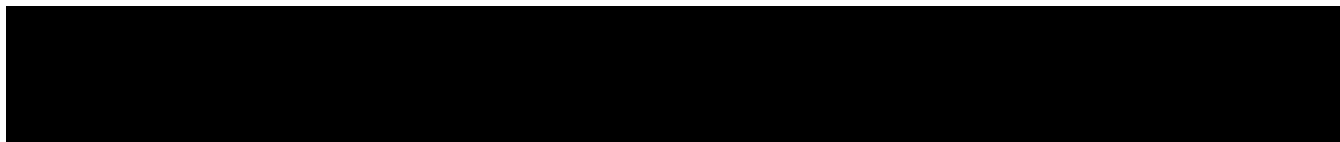
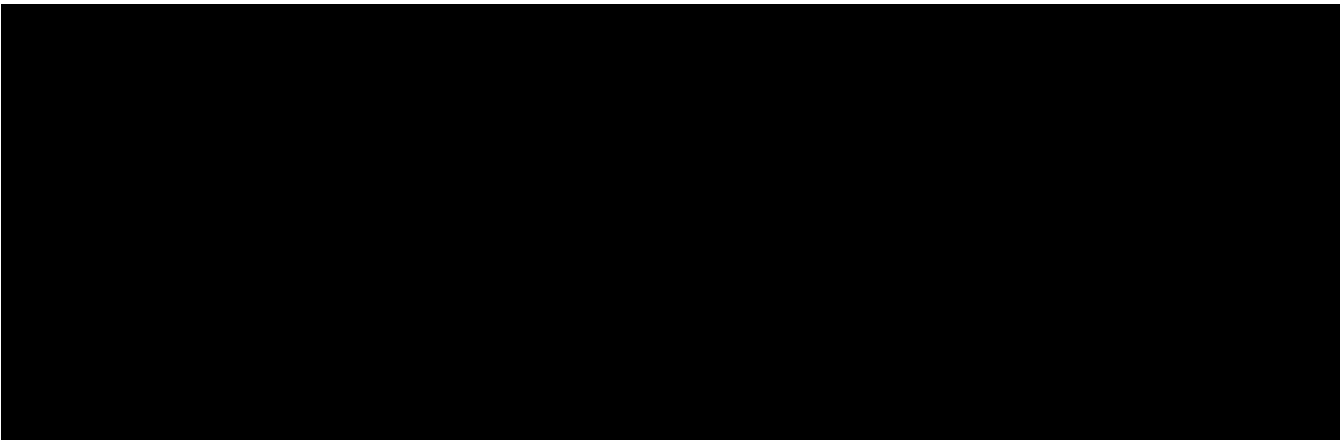
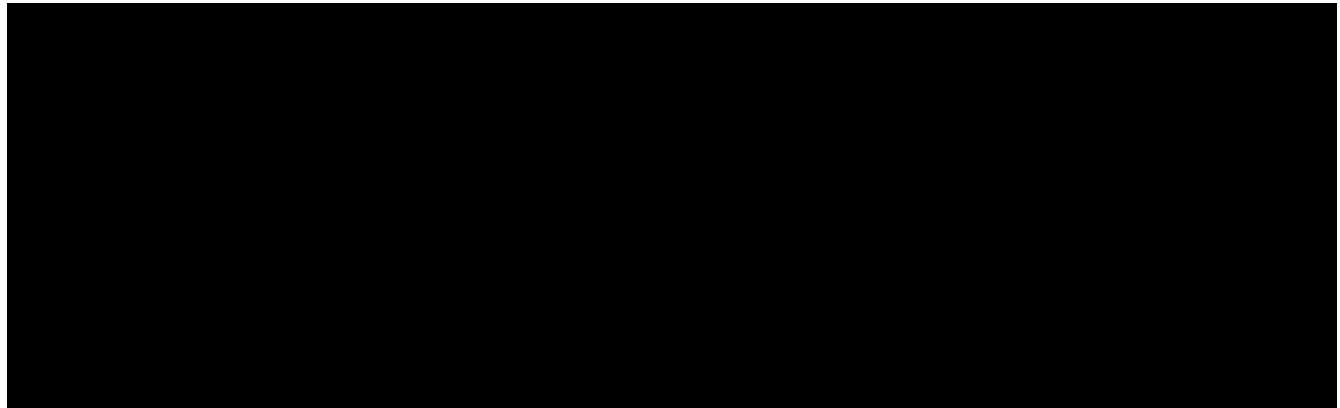
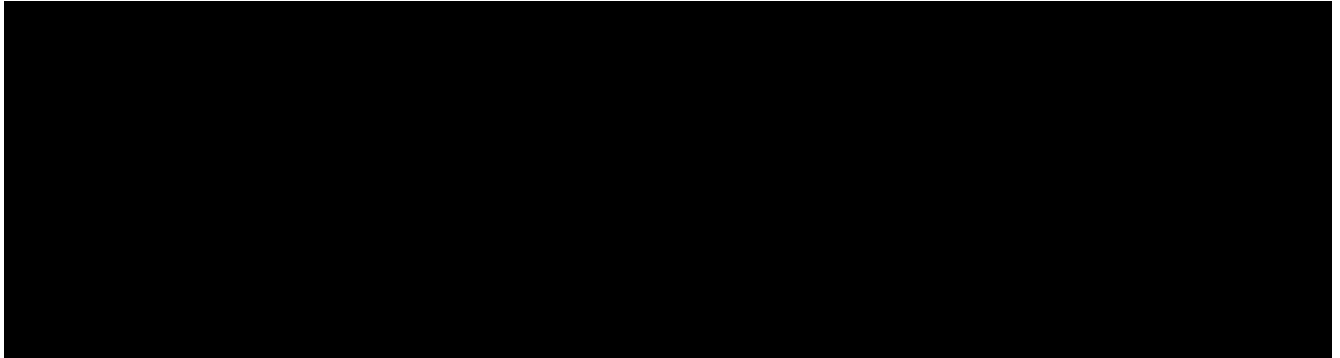
Garmin's expanding World Headquarters are located at 1200 E. 151st Street in Olathe, Kansas.

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Description of Research and Development Activities

In this application, Garmin requests an experimental license for an indoor GPS re-radiation system to facilitate the design and testing of GPS receivers in one building on the campus, known hereafter as the Office Tower. [REDACTED]

Garmin International
Exhibit A to FCC Form 442
File No. 0854-EX-CN-2020 (October 13, 2020)



¹ Manual of Regulations and Procedures for Federal Radio Frequency Management, NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION, U.S. DEPARTMENT OF COMMERCE (Sept. 2017); *available at* <https://www.ntia.doc.gov/page/2011/manual-regulations-and-procedures-federal-radio-frequency-management-redbook>.

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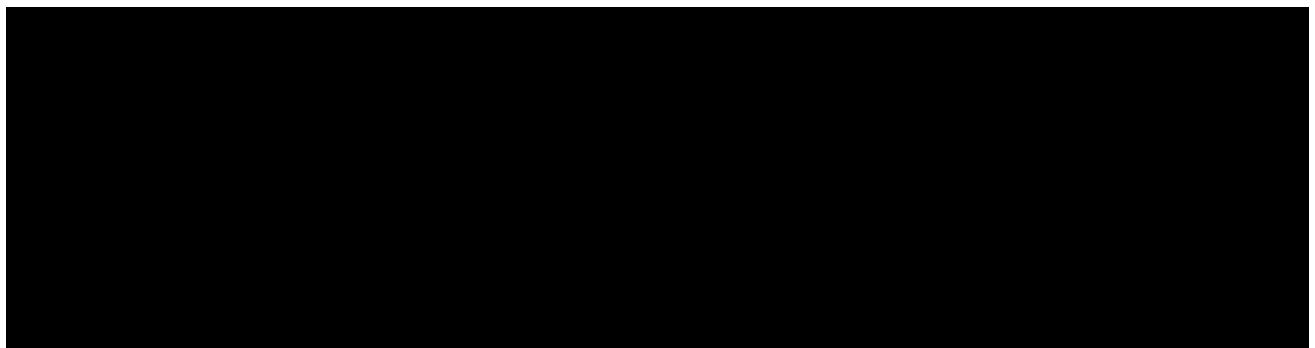
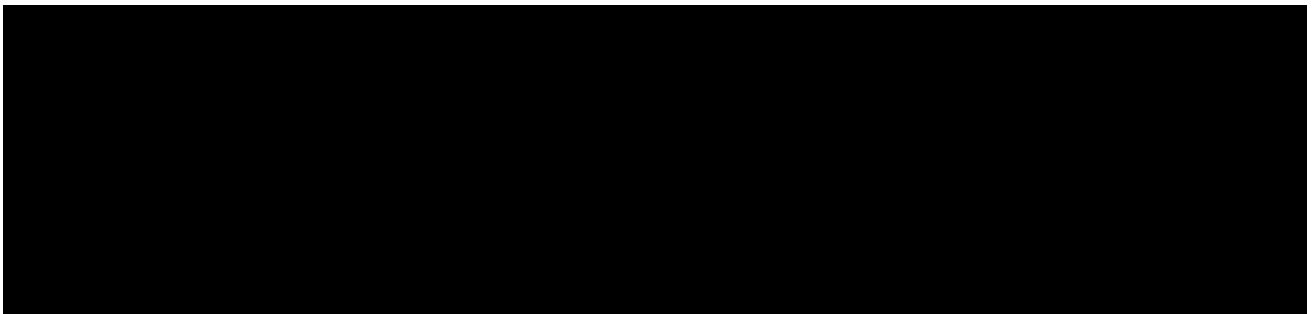
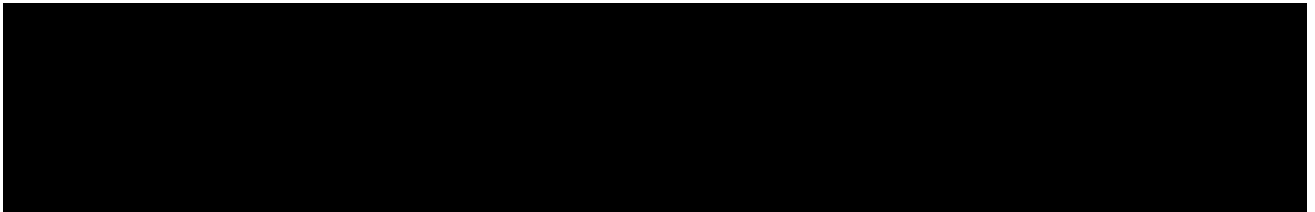
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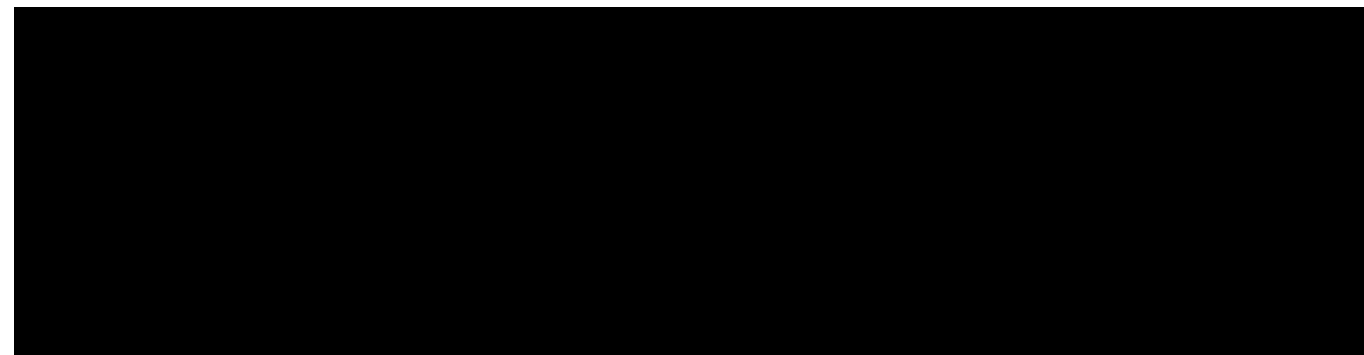
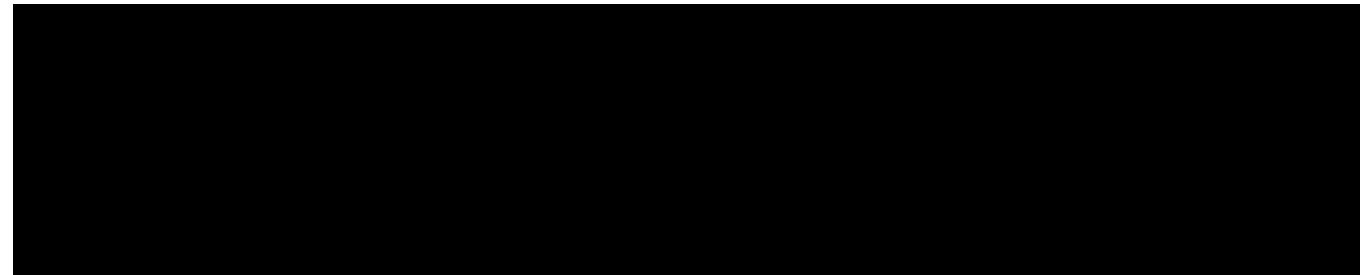
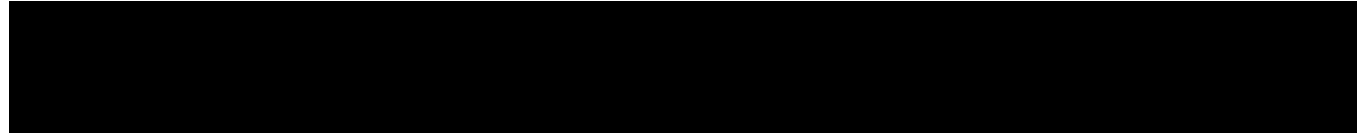
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Bronson Hokuf



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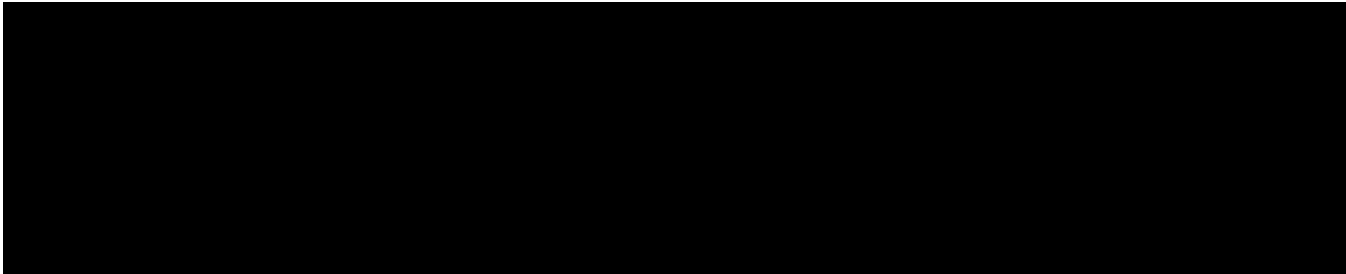


Exhibit B Technical Characteristics

I. NTIA EIRP Limits

Garmin has taken appropriate precautions in system design to ensure the maximum effective isotropic radiated power ("EIRP") from the proposed re-radiation devices does not exceed -140 dBm / 24 MHz at a distance of 100 feet from the exterior of the building, as stipulated in the NTIA Red Book.

II. Technical Parameters and EIRP Calculations

Technical parameters of the re-radiation system for each GPS frequency band are provided below, including calculations for maximum EIRP pursuant to NTIA Redbook requirements. The NTIA standard equation for calculating maximum EIRP is:

$$P_{Tmax} = P_R + 20 \log_{10} f + 20 \log_{10} (30 + d) - 27.55$$

Where P_{Tmax} is the maximum permissible EIRP (dBm); P_R is the power received at 100 feet (30 m) from the building; f is the frequency in MHz; and d is the distance between the radiator and the closest exterior wall of the building (m).

Solving this equation with $P_R = -140$ dBm/24MHz and $d=0$ yields the maximum power allowed (P_{Tmax}) for any single re-radiation device, [REDACTED].

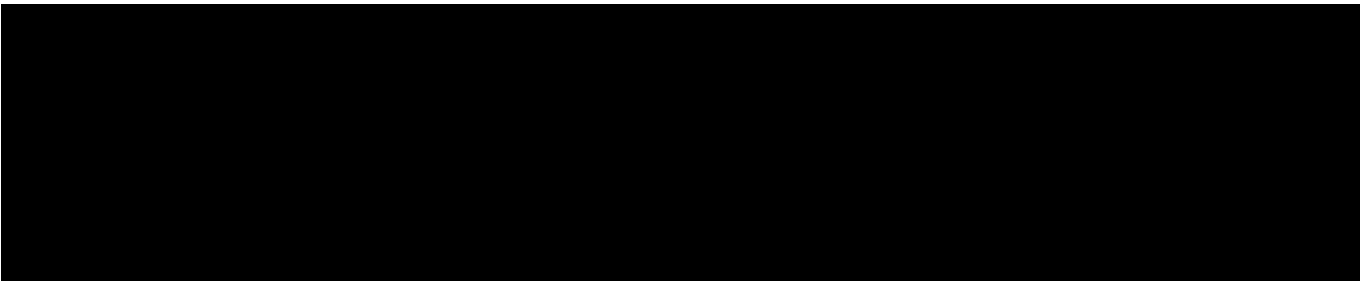
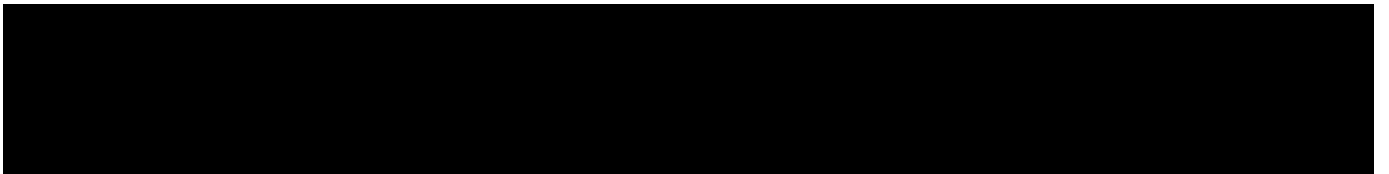
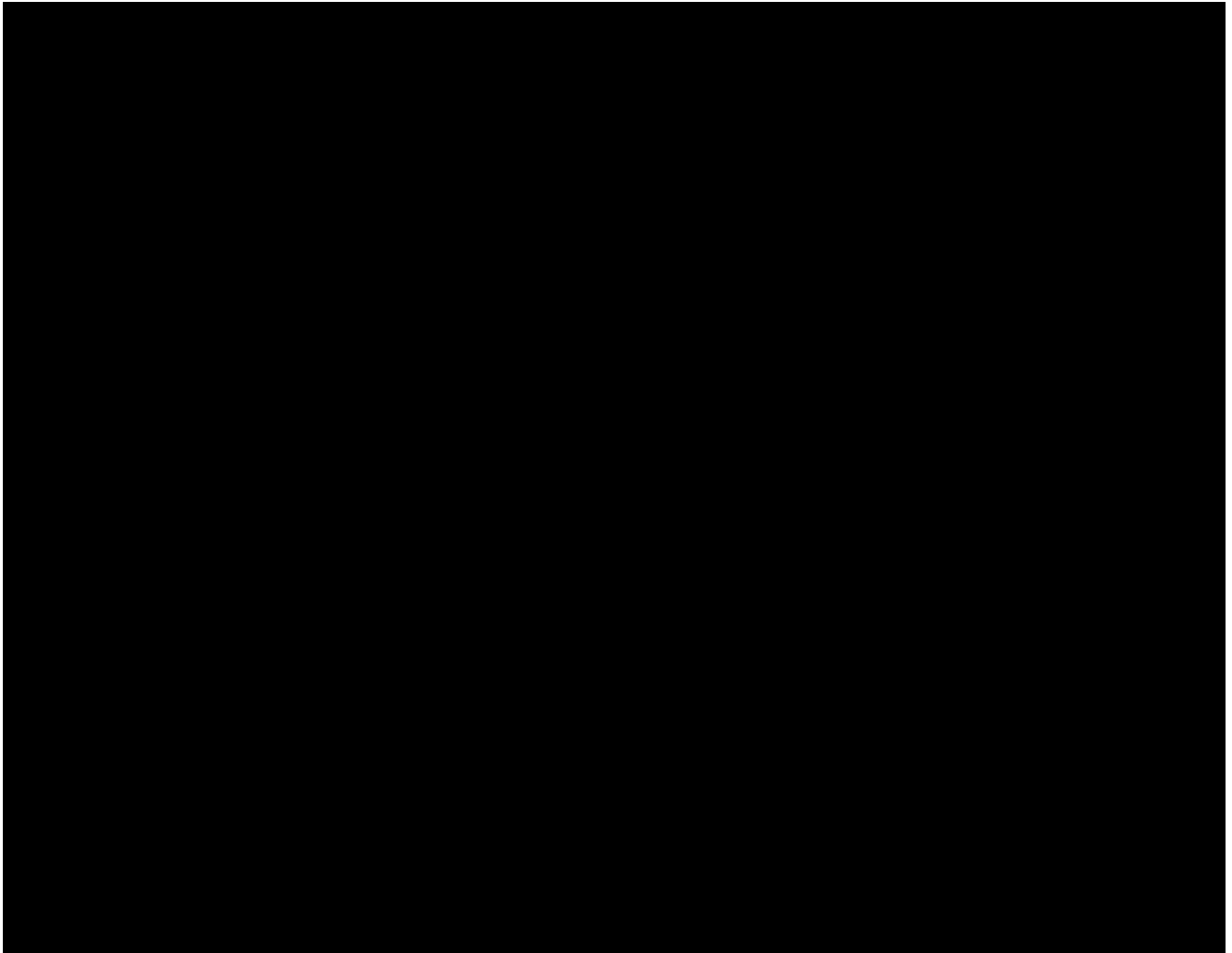
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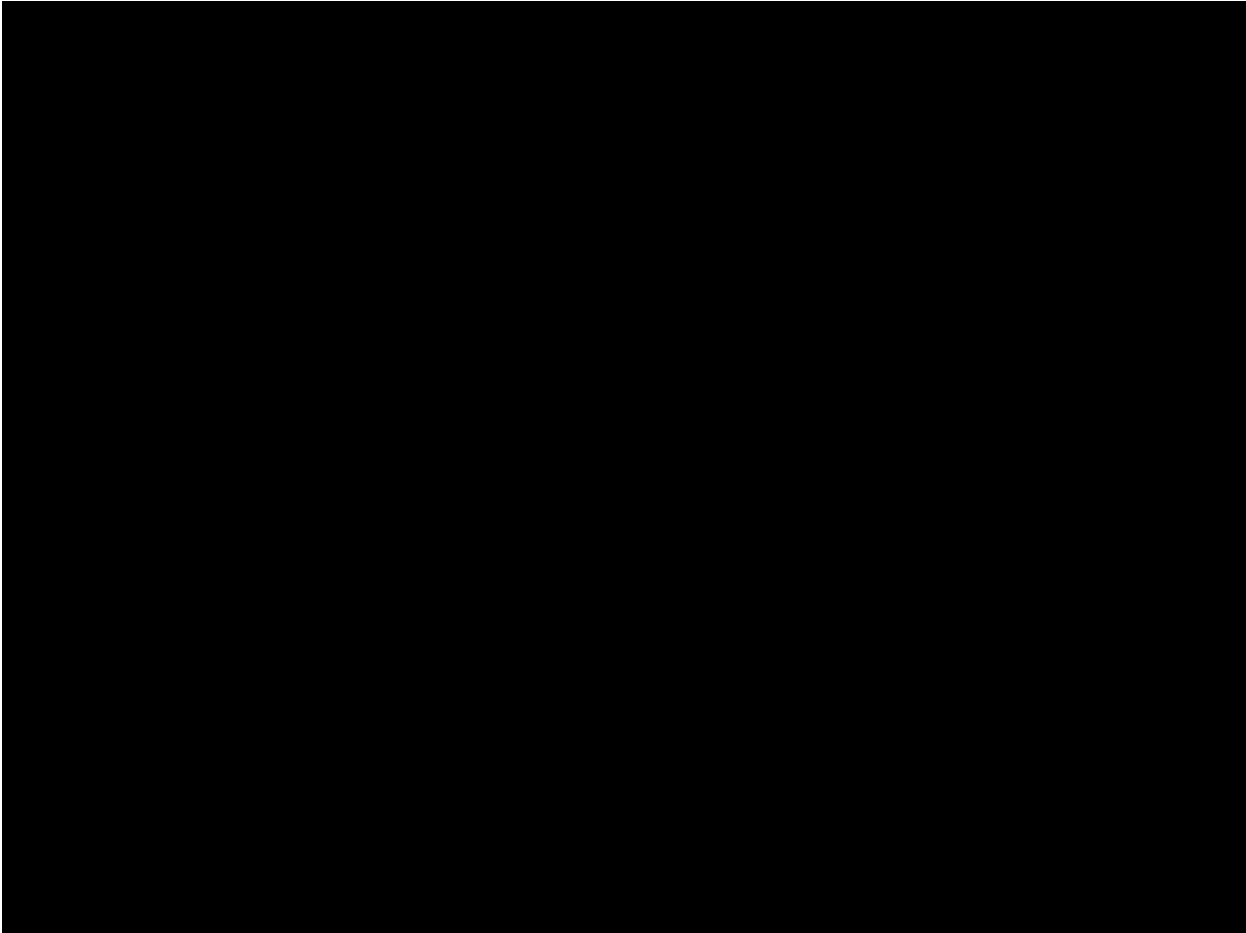
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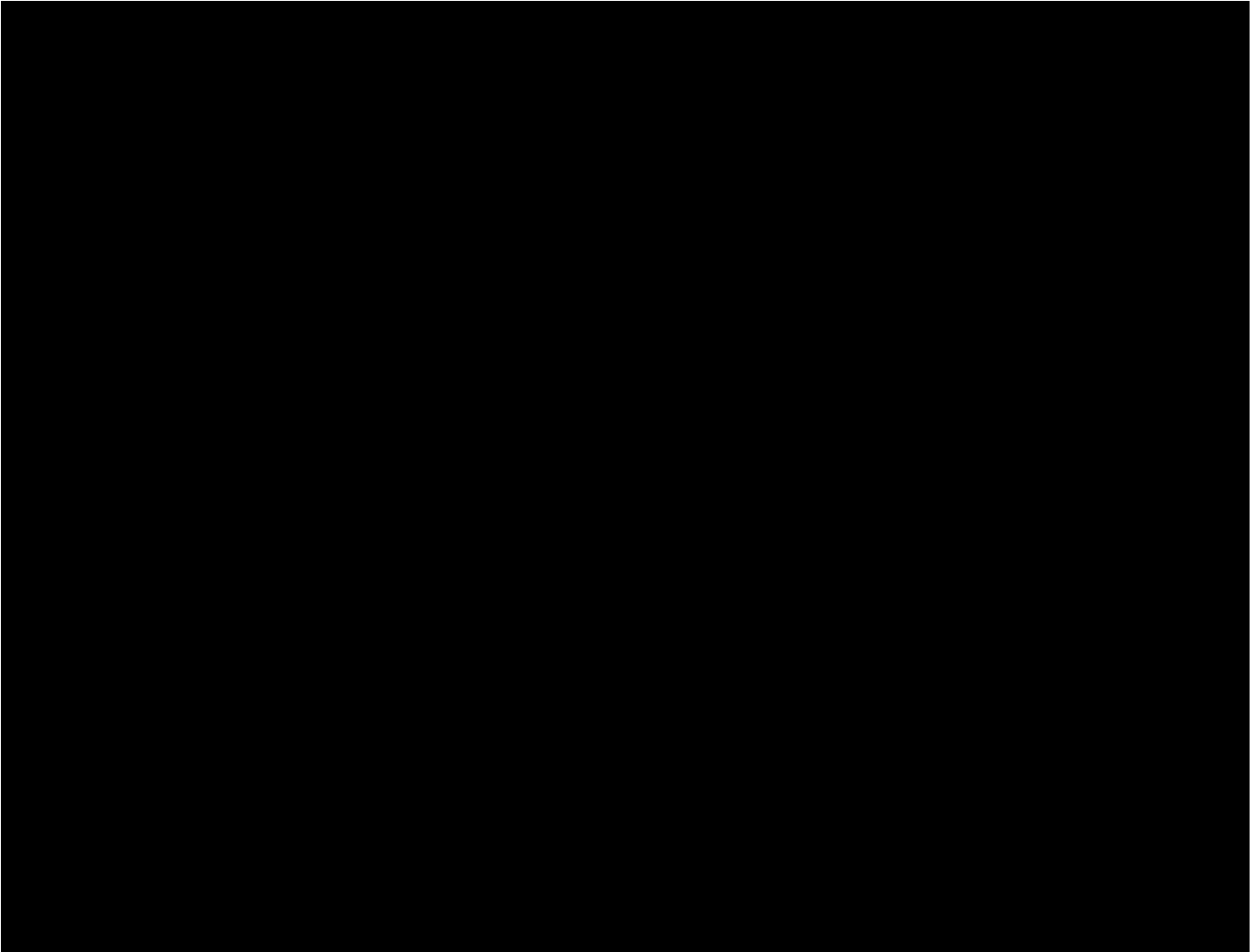
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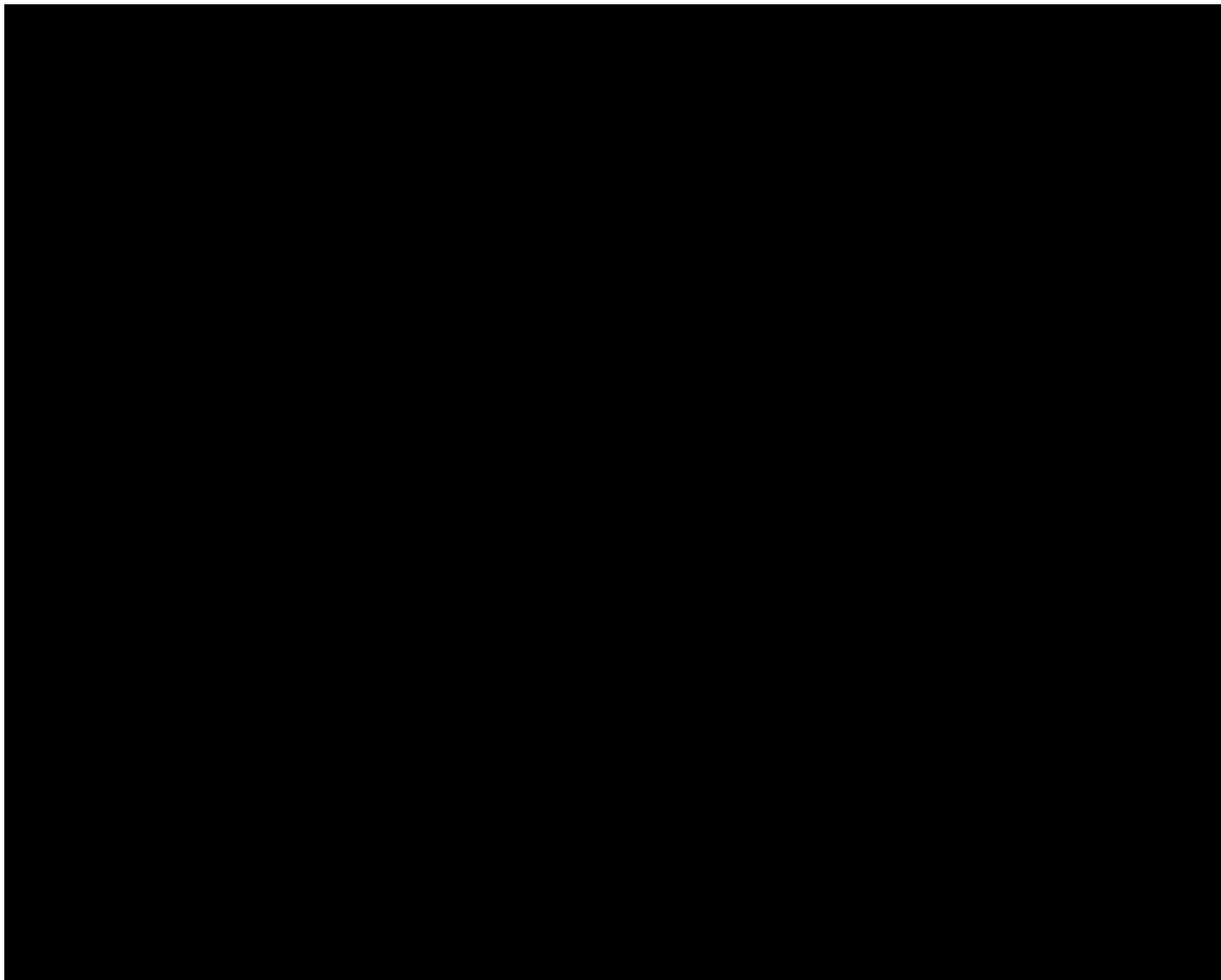
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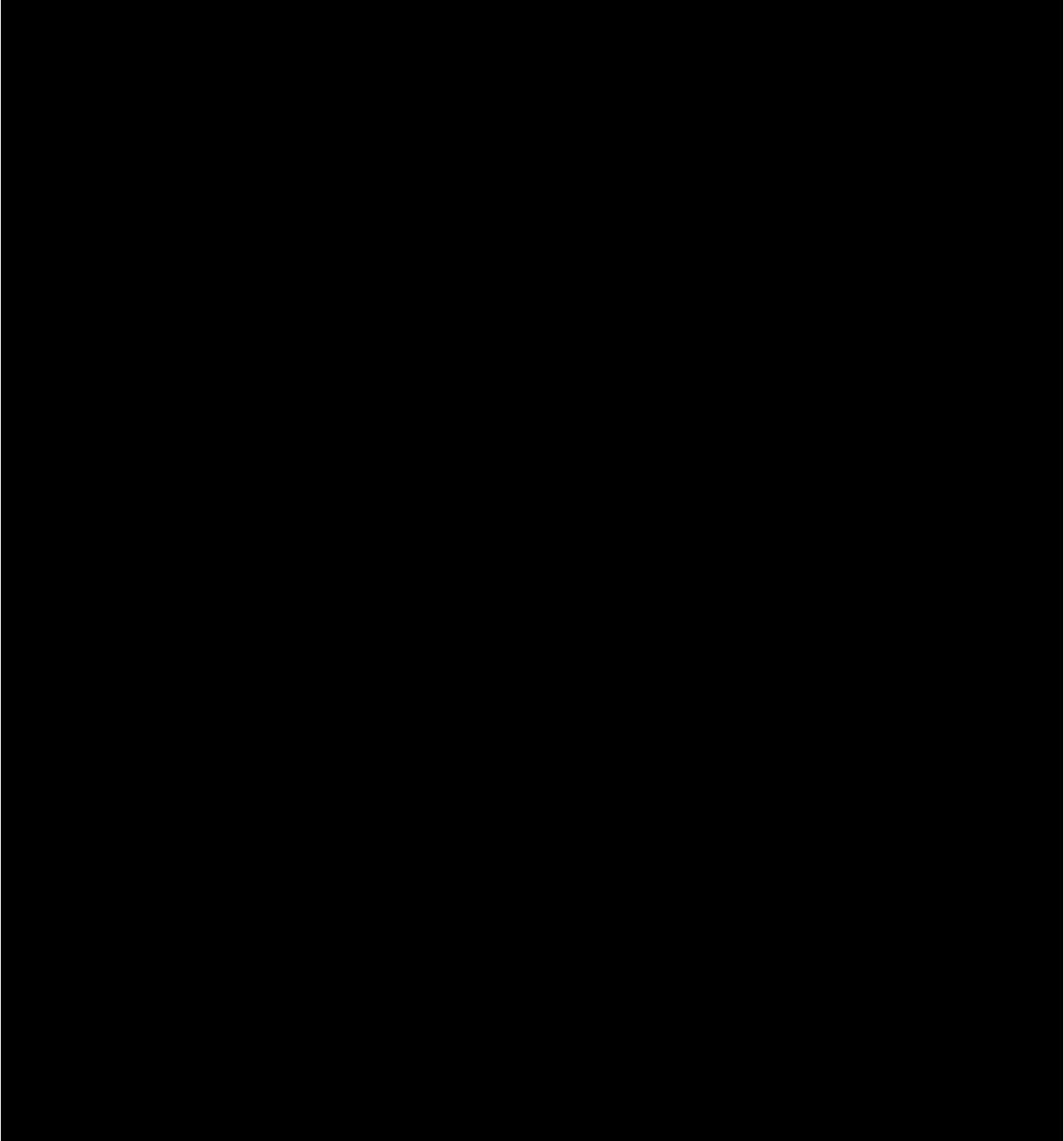
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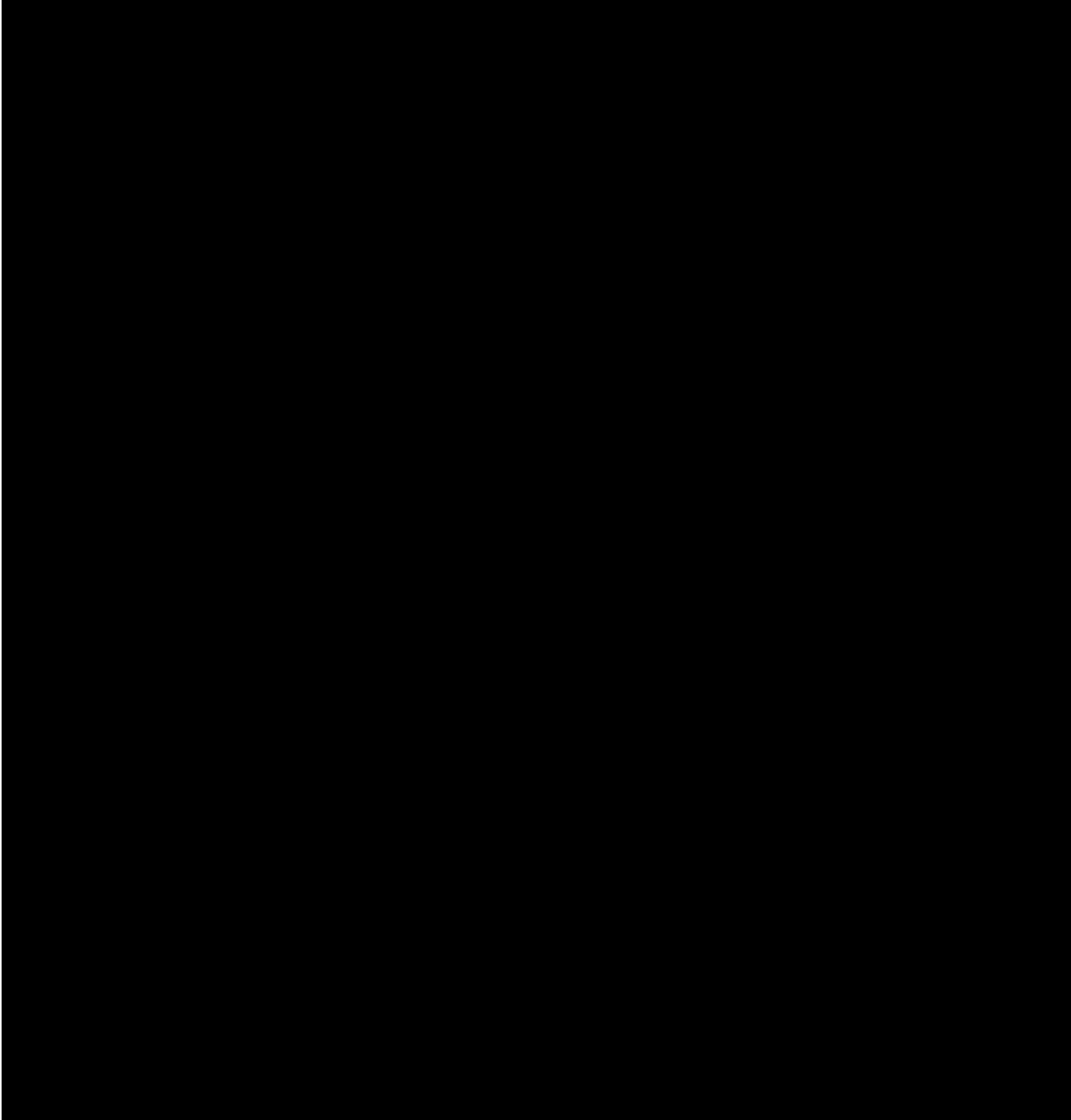
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Garmin International
Exhibit C to FCC Form 442
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EXHIBIT C
AGGREGATE INTERFERENCE ANALYSIS AND
CORRESPONDENCE

(REDACTED IN ITS ENTIRETY)