

From: Russ Herrell

To: Doug Young
Date: May 08, 2020

Subject: Request for Info - File # 0742-EX-ST-2020

Message:

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

The only portion of this filing that is confidential is the annex that was added as an attachment. This annex contains General Atomics proprietary information in the form of technical parameters associated with the company's due regard / air-to-air radar prototype which is being developed as a key component of detect and avoid capability for General Atomics unmanned aerial systems (UAS).

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

Specific circumstances giving rise to the need for this submission are described within 0742-EX-ST-2020 STA application

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

The annex contains proprietary radar antenna specifications, as well as a bandwidth and modulating signal descriptions. All of this information is privileged company information and therefore warrants the confidentiality marking

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

The detailed information contained in the annex would be subject to expropriation by industry competitors if its contents were made known to the public

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

The data contained within the annex relates to a UAS subsystem that is unique to General Atomics and would be valuable and subject exploitation by industry competition, leaving GA in a significantly less competitive and therefore damaged position.

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

Any documentation containing this data is clearly marked as proprietary information, and any non-government entity with whom it is shared must have a non-disclosure agreement in place with General Atomics prior to disclosing the information. Only those with a need-to-know justification are provided this data

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

None of the info contained in annex is available to the public

(8) Justification of the period during which the submitting party asserts that

material should not be available for public disclosure

General Atomics is at least two years away from marketing a commercially available version of its due regard radar. Until that time, this data should be protected from public release lest GA's competitive advantage with industry competition be compromised.

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

The confidential annex qualifies as trade secret and commercial or financial information as listed in 47 CFR Section 0.459. It is therefore GA's position that this data not be shared and the contents of the annex be prevented from public release.