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December 10, 2019

Federal Communications Commission  
Office of Engineering and Technology  
Experimental Licensing Branch  
445 12th St., S.W.  
Room 7-A322  
Washington, DC 20554

To whom it concerns:

Innovative Signal Analysis respectfully requests that the documents entitled "Experimental Licensing Request for Testing Novel Modulation Techniques at ISA Richardson December 10, 2019," submitted via the Universal Electronic Filing System as attachments to Form 442 be held confidential under FCC rules § 0.459 (b).

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

Documents entitled:

"Experimental Licensing Request for Testing Novel Modulation Techniques at ISA Richardson December 10, 2019,"

OET Experimental Licensing Form 442

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

OET Experimental Licensing Form 442 and attachments  
Confirmation Number: EL992285  
File Number: 1032-EX-CN-2019

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

The information contains information on strategic directions and privileged trade secrets.

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

The information does not concern a service subject to competition.

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

The aforementioned documents disclose a research project that could cause significant competitive harm.

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

Access to the information has been on a need-to-know basis within the company and has only been disclosed to limited interested parties.

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

This research project and its technical direction have not been disclosed to the public but only to ISA employees, and associates.

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

A two-year period of confidentiality will allow ISA time to investigate further these novel waveforms for low-power solid-state transmitters in this band for commercial use.

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

None

ISA respectfully requests that these documents not be released to the public.

Best Regards,

Joel Guggenmos  
Sr. System Engineer