

November 11, 2016

The Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Form 442 File Number: 0199-EX-CN-2016

CONFIDENTIAL TREATMENT REQUEST AND JUSTIFICATION

Dear FCC Office of Engineering and Technology:

Pursuant to 47 C.F.R. § 0.457 and 47 C.F.R. § 0.459, Intellectual Ventures Management, LLC, requests that the following items remain confidential from the present time until five years after the granting of the experimental license sought by this application.

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

- A. Exhibit 1, except where not redacted;
- B. Entirety of Exhibit 2, including all parts (a, b, etc.) and pages;
- C. Entirety of Exhibit 3.

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

Form 442 - Application for Experimental License.

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

Exhibit 1 contains a detailed description of the research project, which is a trade secret and designed to facilitate commercialization of the experimental protocols. We are submitting a redacted Exhibit 1 with the confidential information removed while still containing a description of the research to apprise the public of the experimental use.

Exhibit 2 (including parts a, b, c) contains sensitive and proprietary information such as details and design parameters of experimental systems being developed by the applicant. The applicant believes these details to be their intellectual property, “know-how” or non-patent IP. Public disclosure of these details could lead to unauthorized reproduction of these proprietary systems and/or theft of intellectual property.

Exhibit 3 contains specific details about the interior of Intellectual Ventures Lab, including descriptions of the various laboratory spaces, and accurate dimensions of the building elements. Intellectual Ventures Management, LLC protects information about its private spaces and the spaces leased to third parties from public disclosure.

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

Intellectual Ventures submitted this application for confidentiality because the information is commercially competitive. The anticipated experiments are directed at the core concept associated with demonstrating the ability to efficiently transfer electric power over relatively short distances in a localized fashion using the RF spectrum.

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

Intellectual Ventures submitted this application for confidentiality because this information would provide advantages to competitors if they understand and reproduce the technology before Intellectual Ventures is able to market it.

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

The demonstration will be occurring only within Intellectual Ventures' lab facilities, which are used primarily for the development of proprietary technology. The technical information will be limited to a core group of technical specialists responsible for exploring this concept. To the extent additional disclosure occurs, it will be on a need-to-know basis to parties that provide necessary technical or financial support that will be subject to confidential 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:

None of the information contained in the application is available to the public or a third party not subject to severe confidentiality restrictions.

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

This research is highly experimental and may not result in a product or patent for many years. Thus, to prevent competitive harm, this information must remain confidential for at least five years after the application is granted.

Sincerely,

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