

**KeyW Corporation -- Application for Experimental
Special Temporary Authorization (“STA”)**

Request for Confidential Treatment

KeyW Corporation (“KeyW”), pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457 and 0.459, hereby requests that certain information in connection with its application for special temporary authorization (“STA”) be treated as confidential and not subject to public inspection. The designated information constitutes confidential and highly sensitive information that, if subject to public disclosure, would cause significant commercial and competitive harm and pose potential threats to the national security interests of the United States. As described below, KeyW request satisfies the standards for grant of such requests set forth in Sections 0.457 and 0.459 of the Commission’s rules. It would also adversely affect U.S. security interests generally.

In accordance with Section 0.459(b) of the Commission’s rules and in support of this request, KeyW provides the following information:

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

The specific information which requires confidential treatment is KeyW’s government-related internal research and development program and substantive project information. The technical data provided in the FCC Form 442, as well as the information contained in the application Narrative and Technical Appendix, can be made publicly available. This confidentiality request itself does not contain any confidential information and, therefore, can also be made publicly available.

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

The confidential information is submitted in connection with KeyW’s application for a six-month special temporary authorization filed with the Commission on July 31, 2018 (File No. 1403-EX-ST-2019).

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

Information relating to KeyW’s research project and U.S. government support for the proposed experimental STA operations is highly sensitive security-related information that is not available to the public in any form. It also includes private information concerning the applications of KeyW’s technology, including strategic research and development tactics. Disclosure of such information would cause irreparable injury and substantial harm to KeyW’s business operations and competitive position, and would also adversely affect U.S. security interests generally.

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

The information contained herein includes information of a highly confidential and proprietary nature relating to the development of antenna and communications technology for the U.S. government sector. This is a highly competitive industry and the inadvertent release of any private project information would have a severe negative impact on KeyW's competitive position in the marketplace. It would also adversely affect U.S. security interests generally.

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

The disclosure of the substantive project scope and related government support information could have an extremely negative impact on KeyW ongoing business operations and competitive position. Certain proprietary information developed by KeyW is used to support the development of systems and functions for U.S. government and security sectors. Moreover, due to the unique nature of KeyW's experimental operations and their U.S. government applications, confidentiality of sensitive project information must not be shared with competitors.

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

The substantive project scope and related U.S. government information is not currently available to the public in any form and KeyW takes all commercially necessary steps to prevent this information from being disclosed to the public. KeyW has made this information available only to a small selection of people directly related to the project, and only on a need to know basis.

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

The substantive project scope and related U.S. government information for this project is not currently available to the public and KeyW takes all commercially necessary steps to prevent the information from being disclosed to the public. Only those persons or entities directly involved in the project, such as subcontractors and partners, are privy to the subject proprietary information, and only after any such part has executed a non-disclosure agreement.

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

KeyW requests that the substantive project scope and related U.S. government information be kept confidential indefinitely. Such a time period is justifiable in light of the substantial competitive concerns inherent in the defense contracting industry, as well as to protect the security interests of the United States. Due to the sensitive nature of the information, KeyW's requests that the information be kept confidential for an indefinite period.