

Morgan Lewis

Timothy L. Bransford

Partner
+1.202.373.6140
timothy.bransford@morganlewis.com

REDACTED – FOR PUBLIC INSPECTION

September 1, 2020

VIA ELS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**RE: File Number: 0609-EX-CN-2020
Loon LLC Second Supplement
Response to Correspondence Reference No. 57077**

Dear Ms. Dortch:

On behalf of Loon LLC ("Loon"), enclosed please find attached a cover letter and enclosed responses to Commission staff's request for additional information related to the pending Application for an Experimental License in the above referenced file number.

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, Loon respectfully requests that the information and responses attached hereto be treated as confidential and not subject to public inspection. The information and responses constitute confidential and proprietary information that, if subject to public disclosure, would cause significant commercial, economic, and competitive harm. As described below, Loon'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, Loon provides the following information:

Identification of the Information for Which Confidential Treatment is Sought.

Loon seeks confidential treatment for the unredacted/non-public version of the information and responses, which has been marked "CONFIDENTIAL - NOT FOR PUBLIC INSPECTION," and filed by overnight mail with the Commission.

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

T +1.202.739.3000
F +1.202.739.3001

REDACTED – FOR PUBLIC INSPECTION

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

Loon is filing the enclosed Information and responses in support of its Application for an Experimental License to operate a balloon around Spaceport America in New Mexico.

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

The enclosed information and responses contains and reveals highly sensitive commercial information related to the proposed operations and such confidential information is not routinely available for public inspection and is not made publicly available in the ordinary course of business. This confidential 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 enclosed information and responses contains closely guarded proprietary specifications related to the coordinates and geographical areas of Loon's proposed services and operations and thus, such information is subject to vigorous competition from multiple U.S. and non-U.S. third parties.

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

Disclosure of the redacted information contained in the enclosed information and responses would provide valuable insight into Loon's highly confidential proposed operations, business plans and strategies, and would cause substantial competitive harm to Loon's market position.

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

The enclosed information and responses contains sensitive commercial information that is highly confidential and closely guarded. Loon takes significant care to ensure that such information is not released to competitors or the public.

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 disclosures contained in the enclosed information and responses is not available to the public, and has only been disclosed as necessary to limited third parties that are Loon technology partners, and under the expectation of confidentiality. Furthermore, such third parties may also have claims to assert that the information contained therein is confidential.

Marlene H. Dortch, Secretary
September 1, 2020
Page 3

REDACTED – FOR PUBLIC INSPECTION

Justification of the requested period of confidentiality

Loon requests that the Commission withhold the enclosed information and responses out of public view for an indefinite period of time. Release of this information may cause substantial harm to Loon for the reasons set forth herein.

**_*_*_

To the extent you have questions or concerns related to this submission, please contact the undersigned.

Respectfully submitted,

/s/ Timothy Bransford

Timothy L. Bransford
Counsel to Loon LLC

Loon LLC
0609-EX-CN-2020
Reference No. 57077

Applicant: Loon LLC
Date: September 1, 2020
File Number: 0609-EX-CN-2020
Correspondence Reference No.: 57077

Dear Mr. Hung Le:

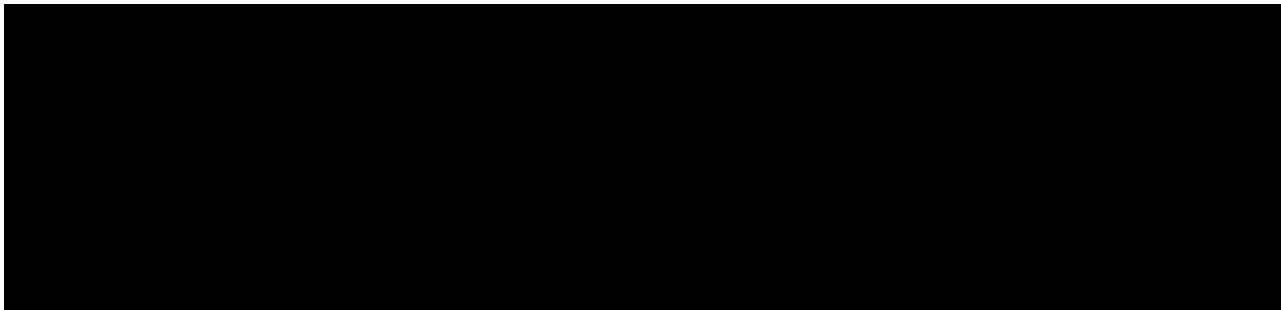
Below please find Loon LLC's (Loon) response to correspondence reference no. 57077. To the extent you have additional questions regarding the above-referenced application, please do not hesitate to contact me.

Sincerely,
Jeanette Kennedy
Regulatory Affairs Manager
Loon LLC

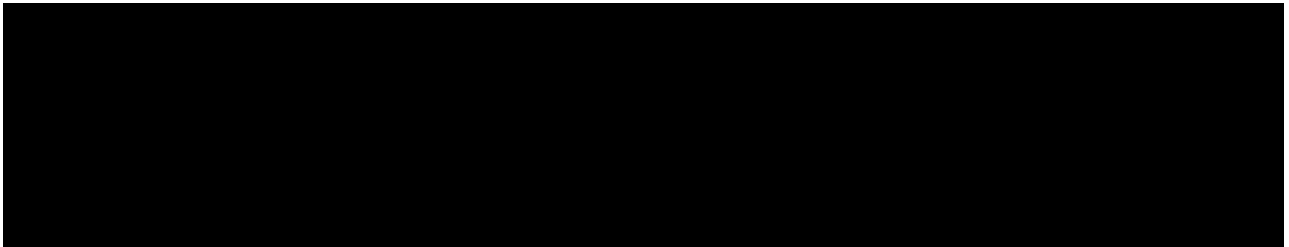
QUESTION 1:

The applicant states that the antenna gain is -4 dB off nadir at an 82 degree slant angle. Since a balloon is subject to winds, the assumption is that there will be some deviation from the ideal slant angle. What happens to their calculation when this happens? .

RESPONSE 1:

A large black rectangular redaction box covering the entire response content.

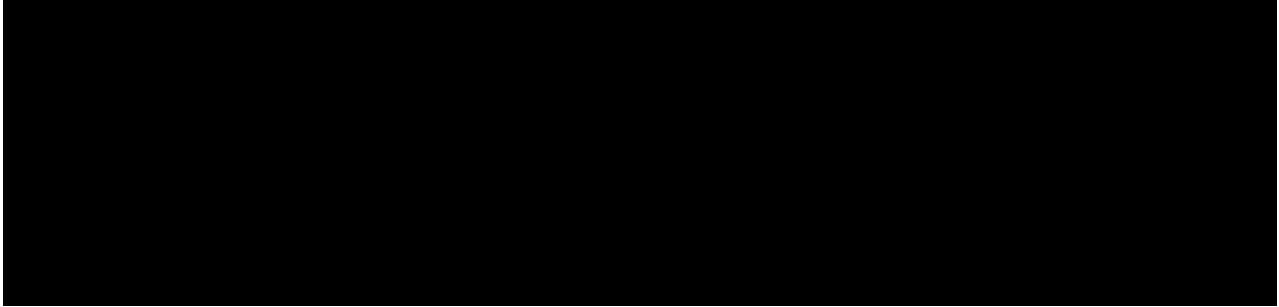
**_*_*_

A large black rectangular redaction box covering the content below the horizontal line.

QUESTION 2:

We assume that a victim receiver even if it's a mobile may or may not experience clutter loss from a transmitter 15 km AAT. What is the basis for a 10 dB clutter loss??

RESPONSE 2:

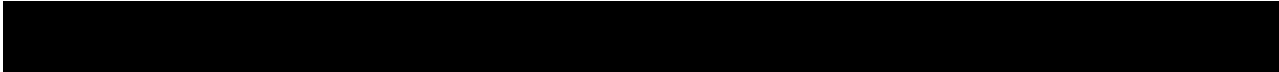


**_*_*_

QUESTION 3:

Are operations intended for outside the U.S. and this is just proof of concept testing?

RESPONSE 3:



**_*_*_