

# Raytheon

Raytheon Integrated Defense Systems  
001 Boston Post Road  
Marlborough, Massachusetts  
01752  
USA

September 7, 2018

Office of Engineering and Technology  
Federal Communications Commission  
445 12TH ST SW  
Washington DC 20554

Subject: Request for Confidentiality

FCC File Numbers: **0697-EX-CN-2018**  
To Whom It May Concern,

We request under 47 CFR 0.459 that the exhibits submitted to the Federal Communications Commission for the following file numbers be withheld from public inspection indefinitely.

File Number: **0697-EX-CN-2018**  
Call Sign: TBD  
Exhibits titled: Request for an Experimental License

Below are statements addressing items (1) through (9) of 47 CFR 0.459(b):

- (1) Identification of the specific information for which confidential treatment is sought;
  - The application contains data such as power level, antenna location, duty factor, pulse width, and modulation type that is considered sensitive export controlled information per direction of the United States Air Force (USAF) customer.
- (2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission;
  - An experimental license is being requested to conduct developmental testing and demonstrations.
- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged;
  - The information is privileged as export controlled because it identifies key radar design parameters sensitive to the USAF customer.
- (4) Explanation of the degree to which the information concerns a service that is subject to competition;
  - The information is important to the USAF customer and their mission as it relates to the current and future products we are developing.
- (5) Explanation of how disclosure of the information could result in substantial competitive harm;
  - Our competitors may be able to use the information to their benefit by incorporating similar aspects into their design, or to hinder our efforts to obtain competitive contracts. The end result might be harmful to our company and give our competitors an unfair advantage.

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- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure;
  - The submitted information has the appropriate distribution statement, export control marking, and destruction notice.
  
- (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 specific information has never been available to the public.
  
- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure; and
  - We request that the information be withheld from public disclosure indefinitely as it is sensitive export controlled data.
  
- (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

Sincerely,

Richard Lockrem  
Spectrum Management  
Raytheon Integrated Defense System