

July 15, 2019

Federal Communications Commission
Office of Engineering and Technology
Experimental Licensing Branch
445 12th Street SW
Washington D.C. 20554

Re: Rockland Wireless LLC
Application File No.: 0566-EX-CN-2019
Request for Confidential Treatment

Pursuant to Section 0.457 and 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act ("FOIA"), Rockland Wireless LLC ("Rockland") hereby requests confidential treatment of certain information in the above-referenced application for experimental license filed contemporaneous with this request. Specifically the Technical Narrative Exhibit, Antenna Radiation Pattern Exhibit, and Tower/Antenna Configuration Exhibit (the "Confidential Information") be treated as confidential and withheld from public inspection. This information qualifies as trade secrets and commercial information that falls within the Exemption 4 of FOIA¹ and Section 0.457(d) of the Commission's rules.²

In support of this request and pursuant to Section 0.459(b) of the Commission's rules,³ Rockland provides the following information:

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

Rockland requests confidential treatment for the following information contained in Experimental Application File No. 0566-EX-CN-2019:

- Technical Narrative Exhibit
- Antenna Radiation Pattern Exhibit
- Tower/Antenna Configuration Exhibit

These materials contain specific information about the technical parameters to be used in Rockland's experiment, including trade secrets belonging to Rockland or its affiliates or vendors. Rockland does not seek confidential treatment for the stop buzzer contact information exhibit provided with the application.

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

This information is submitted in support of our application for experimental license that Rockland has filed on July 15, 2019 with the Commission.

¹ 5 U.S.C. § 552(b)(4)

² 47 C.F.R. § 0.457(d)

³ 47 C.F.R. § 0.459(b).

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

The Confidential Information has significant commercial value, and the technology, equipment, tests, and experiments described in the Technical Narrative Exhibit, Antenna Radiation Pattern Exhibit, and Tower/Antenna Configuration Exhibit constitute trade secrets of Rockland and its affiliates and vendors.

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

The technology subject to this experimental application is under development; however, if the tests are successful, they may lead to substantial developments in the competitive wireless data transmission field which would provide a significant benefit for Rockland.

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

The public release of the Confidential Information would jeopardize Rockland's commercial plans and strategy, and enable competitors to unfairly exploit Rockland's efforts, develop similar services and technologies, and inform their decisions and actions. This may cause negative effects relative to time to market for Rockland's technology versus competitive solutions, reducing competitive advantage that it seeks to achieve from its research. Furthermore, it would deprive Rockland of the value of time, effort and expense invested in conducting its experiments.

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

Rockland has taken steps to keep the information confidential by limiting the number of people that have access to such information to only those on a need to know basis, and by requiring such people to be bound by non-disclosure agreements, contractual confidentiality covenants, or equivalent professional obligations.

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 Confidential Information is not available to the public. Rockland only discloses the Confidential Information pursuant to restrictive safeguards described above.

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

The Confidential Information should be withheld from public inspection indefinitely. Rockland should be entitled to the benefits of its experimental designs and conclusions until such time as Rockland

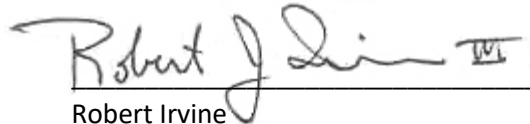
has developed a business plan that requires disclosure. Furthermore, Rockland's business plans are expected to undergo further changes based on the test conducted, and confidentiality is necessary to protect those evolving plans.

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

The public interest would not be served by disclosure of the Confidential Information. The Commission should provide experimenters with the protection of their proprietary information during the course of experiments that supports the goal of development. There is nothing material that public review of this information would add to the Commission's analysis of Rockland's request for an experimental authorization.

Accordingly, Rockland requests that the material be withheld from public inspection. In addition, consistent with 47 C.F.R. § 0.459(d)(1), Rockland requests notification if release of the information subject to this request is requested pursuant to the FOIA or otherwise, so that Rockland may have an opportunity to oppose grant of any such request.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert J. Irvine" with a stylized flourish at the end. The signature is written over a horizontal line.

Robert Irvine
Secretary, Rockland Wireless, LLC