



Date: [June 16, 2020](#)

Federal Communications Commission  
OET Experimental Licensing Branch,  
Washington, DC

Applicant: [SAExploration.](#)  
File Number: [0460-EX-CN-2020](#)  
RE: [Request for Confidentiality per FCC Rule Sections 0.457 and 0.459](#)

Rationale for request for confidentiality:

[SAExploration has invested considerable time and resources in the development of its products, including creating the definition document for the design and development of the technologies in question for this application. Disclosure of the confidential portions of this application to competitors would give them a competitive advantage in developing similar types of products or technologies.](#)

In accordance with the rules in CFR 47, Part 0.459(b):

- (1) Identification of the specific information for which confidential treatment is sought:  
[Operation Description](#)  
[Antenna Datasheets \(All\) documents](#)  
[Block Diagrams/FlowCharts \(All\) documents](#)
- (2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission  
[SAExploration seeks to continue development, field testing and evaluation of technology for a wireless seismic recording system with real-time seismic data return for use in oil, energy and mineral exploration and similar industries.](#)
- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged  
[This technology is being developed towards the objective of producing research and development products for highly confidential and secure industrial applications to be sold to the oil, energy, mineral and similar industries.](#)
- (4) Explanation of the degree to which the information concerns a service that is subject to competition  
[There are a number of companies with competing products using similar technology. Three examples are the Geospace Technologies Corporation, with their GCX \(FCC ID: WAOGCX\) or GSX \(FCC ID: WAOGSXLF\), Inova Geophysical with their Firefly system \(FCC ID: MCV-FSU3\) and Sercel's Unite CANII system \(FCC ID: KQ9VIB-0006B\).](#)
- (5) Explanation of how disclosure of the information could result in substantial competitive harm  
[Disclosure of information pertaining to how the SAExploration system operates could give competitors privileged knowledge and strategic advantage in developing their wireless seismic cableless systems.](#)
- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure  
[The system is not distributed, marketed, or sold to the general public. Development, field testing and evaluation of the technology and products is only by the Applicant. The applicant will retain complete control over access to the technology and related products ensuring that only authorized entities, covered or contracted by NDA, are privy to technology information at any given time.](#)

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- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties  
Information is not available to the public. Any previous disclosure of information to third parties required Non-Disclosure Agreements.
- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure  
The technology development is part of a continuous effort to develop a viable commercial system. Disclosure of information pertaining to how the system operates could give SAExploration's competitors an advantage in developing systems with similar technologies and, also, could effect bringing a competitive system with similar technologies to the market before maturity of the SAExploration technologies.
- (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 SAExploration., technologies for which this license is filed are next generation wireless technologies that incorporate the valuable knowledge gained with the existing company competencies.

SAExploration, has no objection to the release of the completed and submitted Form 442, New License/Modification of License, to the public.

If you have questions or need further information, please contact the undersigned.

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Signature

Name Bruce McFarlane  
Company:SAExploration  
email:bmcfarlane@saexploration.com  
tel: 281-753-2754