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December 6, 2016

VIA OET EXPERIMENTAL LICENSING SYSTEM

Office of Engineering and Technology
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: Request for Confidential Treatment - Correspondence Reference No. 34750
Application of The Walt Disney Company for Experimental STA
File No. 1570-EX-ST-2016

The Walt Disney Company (“Disney”) hereby submits this request for confidential treatment of information provided in Disney’s response (“Response”) to the issues raised in a request for information, Correspondence Reference No. 34750, by the Satellite Division of the International Bureau (“Bureau”) of the Federal Communications Commission (“FCC”) in connection with the above-referenced application (“Application”) for Special Temporary Authority (“STA”).

Pursuant to 47 C.F.R. §§ 0.457, 0.459, Disney requests confidential treatment for Exhibit A to the Response. In support of this request and pursuant to Section 0.459(b) of the Commission’s rules,¹ Disney hereby states as follows:

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

Disney requests confidential treatment with respect to all information in Exhibit A.

2. Identification of the circumstance giving rise to the submission.

Disney is submitting Exhibit A to provide information requested by the Bureau regarding the proposed operations contemplated by the Application.

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

¹ 47 C.F.R. § 0.459(b).

The confidential information in Exhibit A is highly sensitive commercial information specific to the development of attractions and features at Disney's parks and resorts. This information is generally safeguarded from competitors and is not made available to the public.

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

The confidential information provides insight into the development of new attractions and features at Disney's parks and resorts, which compete for patrons with other theme parks, resorts, and vacation destinations at a regional, national, and global level.

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

Disclosure of the information for which confidential treatment is sought could cause substantial competitive harm to Disney, because it would provide competitors insight into confidential information regarding the development of new attractions and features at the Disney parks and resorts that would not otherwise be publicly available, which would work to Disney's severe competitive disadvantage.

6. Identification of any measures taken to prevent unauthorized disclosure.

Disney routinely treats the information for which confidential treatment is sought as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

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

Disney does not make the information for which confidential treatment is sought available to the public, and this information has not been previously disclosed to third parties.

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

Disney requests that the redacted information be treated as being confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to Disney.

For the foregoing reasons, Disney submits that good cause has been demonstrated in support of this request for confidential treatment and, accordingly, urges the Commission, or its delegated authority, to grant this request and withhold the redacted information from public inspection. To the extent the Commission, or its delegated authority, disagrees and denies this request, Disney

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requests that the Application (including the Response and Exhibit A thereto) be returned to Disney without consideration by the Commission, pursuant to section 0.459(e) of the Commission's rules.

Sincerely,

/s/G. Peter Carr
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