

To Whom it May Concern,

Pursuant to Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§ 0.457, 0.459, Vivint Wireless, Inc. requests that specific information provided in support of the above referenced application for Special Temporary Authority (STA) be treated as confidential and not available for public inspection. The referenced information to be treated confidential, if subject to public inspection, would provide privileged and commercially valuable information that would cause material commercial, economic, and competitive harm to Vivint Wireless. Vivint Wireless fulfills the standards for this request of confidentiality that are stated in Sections 0.457 and 0.459 of the FCC Rules with the information below.

The information below is provided pursuant to Section 0.459(b) and in support of the confidentiality request.

1. Identification of information for which confidential treatment is sought:

Vivint requests confidential treatment of the information redacted from the STA and complementary exhibits. Vivint has taken significant measures to keep its activities and interests in respect to this STA confidential and public review of even seemingly inconsequential information could jeopardize the competitive value of Vivint Wireless' secret commercially valuable plan. Due to the amount of information being redacted, Vivint has also taken significant measures to facilitate these experiments in an area that is controlled by Vivint and will create no issues of interference to other parties or devices.

Exhibit A - Narrative

Pursuant to the requirements established in Section 5.61 of the FCC Rules, 47 C.F.R § 5.61, Vivint details its need and justification for the requested Special Temporary Authority to be granted expeditiously.

Vivint Wireless is requesting the STA be granted for a period of 180 days. This is necessary for Vivint to perform testing of a pre-commercial device that we expect to contribute to innovate products and services REDACTED.

The device contains REDACTED operating from REDACTED. Each antenna is REDACTED to create REDACTED.

All experiments will be performed by Vivint and its third parties under strict nondisclosure. The device is not intended for use by the general public and there will not be any commercial operations. Additionally, all devices will be collected or destroyed at the conclusion of the experiment or expiration of the STA.

This experiment poses no material risk of harmful interference to devices or general risk to the public. The device currently meets nearly all requirements of §15.209 with a 0.97dB variance at 7800 MHz.

Exhibit B -Antennas

The device consists of REDACTED that allow the device to REDACTED. Each antenna has a REDACTED and a REDACTED.

Width of beam in degrees at the half power point	REDACTED
Antenna Gain (dBi)	REDACTED
Orientation in horizontal plane	REDACTED
Orientation in vertical plane	REDACTED

Antenna/Transmitter Information

Manufacturer	REDACTED
Model Number	REDACTED
Quantity	15

Frequency Range	Low (GHz)	High (GHz)
	REDACTED	REDACTED

Modulation	Emission Designator	Necessary Bandwidth (MHz)	Output Power (mW)	ERP (W)	Mean/Peak	Frequency Tolerance
Digital	REDACTED	REDACTED	REDACTED	REDACTED	Peak	REDACTED

Exhibit C - Structure & Topography

The antennas will be mounted on REDACTED at a location that Vivint is able to control access to. The surrounding buildings and topography in combination with the frequencies that will be used will greatly limit propagation to just outside of the test area and will create no risk of interference to the nearest aircraft landing area ~ 10km to the south-west.

REDACTED

REDACTED

	Latitude	Longitude	Radius (m)
Test Location Centroid	[REDACTED]	[REDACTED]	[REDACTED]

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

The above referenced Exhibits were submitted to the Commission in support of the STA. These Exhibits were filed with the Office of Engineering and Technology on 7/31/2017. For additional information, please see File No. 1025-EX-ST-2017.

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

The information requested to be kept confidential is both privileged and holds significant commercial value as it may pertain to products, developments, and services that would provide competitive advantages in industries for Vivint Wireless. The commission's clarification on confidential treatment of trade secrets, supports Vivint Wireless's request for confidentiality of this test that with the combination of radio, frequency, antenna, and physical configuration; represents a "secret commercially valuable plan" as the term is stated and recognized by the Commission. Due to the multi-component nature of this test and "secret commercially valuable plan", it is essential that locations, manufacturer name, model number, frequencies, and antenna & radio specifications be awarded confidentiality.

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

The services, technologies, and configurations involved in this test are being evaluated in combination as a competitive service that is expected to result in new products and offerings.

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

Vivint has invested significant resources in product and technology development for the creation of competitive products and services. Public disclosure of technical, product, and location information would jeopardize Vivint Wireless' competitive value by giving others privileged knowledge that could result in the development of similar products and services.

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

Vivint has made significant efforts to keep information confidential by carefully managing information internally to only required parties, requiring robust nondisclosure agreements with all third parties, and by making financial investments in order to retain exclusivity and confidentiality on ideas and technologies.

7. The information contained in the confidential exhibits is not available to the public, and has only been disclosed to third parties with strict confidentiality requirements.

Vivint voluntarily provides this information at this time with the expectation that it will be recognized and treated as confidential in accordance with the Commission's rules. See *Critical Mass Energy Project v. Nuclear Regulatory Comm'n*, 975 F.2d 871, 879 (D.C. Cir. 1992) (commercial information provided on a voluntary basis "Is 'confidential' for the purpose of Freedom of Information Act (FOIA) Exemption 4 if it is of a kind that would customarily not be released to the public by the person from whom it was obtained.").

8. Justification of the requested period of confidentiality.

Confidentiality of the specified information and exhibits should be maintained for the duration of the experiment (180 days) and thereafter as to not undermine the competitive and secret commercial value established by Vivint.

9. Any other information that would be useful in assessing whether this request should be submitted.

The information submitted for confidentiality should remain confidential indefinitely and not be made available for public inspection. Public inspection of the material referenced would provide no additional value to the Commission's assessment of the experiment. Likewise, as there is no risk to public or private systems based on the equipment and operations of the experiment, there is no value in public disclosure. However, public disclosure would cause Vivint Wireless irreparable harm by eroding the competitive value that it has established.

Though Vivint Wireless believes it has satisfied all requirements for grant of the STA and confidentiality, in the event that the Commission considers differently; per § 47 CFR 0.459 (e) Vivint Wireless requests that the all Exhibits be returned and kept from public record.