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VIA OET EXPERIMENTAL LICENSING SYSTEM

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

Re: Revised Confidentiality Request
Application of Anduril Industries, Inc. STA
File No. 0052-EX-ST-2021

Anduril Industries, Inc. (“Anduril”) hereby submits this revised request for confidential treatment of information provided in support of the above-referenced application (the “Application”) for Special Temporary Authority (“STA”).

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

¹ 47 C.F.R. § 0.459(b).

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

Anduril requests confidential treatment with respect to all information in Exhibit A that is highlighted and located between the headings [***BEGIN CONFIDENTIAL***] and [***END CONFIDENTIAL***].

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

Anduril is submitting the Application and supporting documentation in order to request an experimental STA.

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

The confidential information in Exhibit A is highly sensitive commercial information specific to the Anduril's research and development of hardware and software products that solve complex national security challenges for the U.S. Government and its allies. 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 national security-related hardware and software, an area in which there robust competition.

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 Anduril, because it would provide competitors insight into confidential information regarding the development of new hardware and software that would not otherwise be publicly available, which would work to Anduril's severe competitive disadvantage.

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

Anduril 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.

Anduril 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.

Anduril 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 Anduril.

For the foregoing reasons, Anduril 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, Anduril requests that the Application be returned to Anduril without consideration by the Commission, pursuant to section 0.459(e) of the Commission's rules.

Respectfully submitted,

/s/ Nathaniel Edwards
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