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November 5, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Request for Confidential Treatment
AST&Science Experimental License Application: File No. 0884-EX-CN-2018

Dear Ms. Dortch:

Pursuant to Sections 0.457 and 0.459 of the Federal Communications Commission's rules,^{1/} AST&Science hereby requests confidential treatment of information submitted in support of its experimental license application in order to protect commercial information and trade secrets.

- (1) **Identification of specific information for which confidential treatment is sought:** AST&Science seeks confidential treatment of the information in the application and in the exhibits attached to the application regarding the frequencies used, power levels, and the design of the experiment.
- (2) **Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:** File No. 0884-EX-CN-2018 (application for experimental license).
- (3) **Explanation of the degree to which the information is commercial or financial, or contains a trade secret, or is privileged:** Information regarding the frequency ranges used, power levels, design of the satellite system, and time to market is commercial information that are also protected trade secrets.
- (4) **Explanation of the degree to which the information concerns a service that is subject to competition:** The frequencies being used are subject to competitive auction.
- (5) **Explanation of how disclosure of the information could result in substantial competitive harm:** AST&Science is developing a novel low-Earth orbit ("LEO") satellite system that will compete in the marketplace against a number of other LEO systems being developed today. Competitors could use information regarding the design of the system and intended frequency range to design similar systems or pursue AST&Science's customers. This would undermine the investments that AST&Science has made into developing its system.
- (6) **Identification of any measures taken by the submitting party to prevent unauthorized disclosure:** AST&Science ensures protection of this information through the use of non-disclosure agreements (NDAs) and confidentiality policies with employees, suppliers,

^{1/} 47 C.F.R. § § 0.457 and 0.459.

consultants, etc. Additionally, AST&Science takes care not to disclose this information publically on its website, in press releases, during interviews, or in any other manner.

- (7) **Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:** None of the information for which AST&Science seeks protection is available to third parties other than those subject to NDAs or confidentiality requirements.
- (8) **Justification of the period during which the submitting party asserts that material should not be available for public disclosure:** AST&Science seeks protection of confidential information until it brings its technology to market to ensure that competitors do not receive trade secrets via the Commission's licensing process.
- (9) **Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:** AST&Science is developing a novel technology, the particulars of which could be used by other parties to gain a competitive advantage in the marketplace.

Sincerely,



Laura A. Stefani
Attorney for AST&Science