

From: Louie Castro

To: Hung Le

Date: January 15, 2021

Subject: Request for Info - File # 1022-EX-CN-2020

Message:

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. NW
Washington DC 20554

Re: Experimental License Application 1022-EX-CN-2020
Request for Confidential Treatment of Material Filed

FILED ELECTRONICALLY

Dear Ms. Dortch:

Cisco Systems, Inc. requests, per Section 0.459 of the Commission's rules, confidential treatment of material filed in support of the above-referenced application. Cisco submits the following in conformance with the requirements of Section 0.459(b) of the Commission's rules:

1. Identification of the specific information for which confidential treatment is sought.
 - Description of radio system: This application is for experimental purposes on the premises of Cisco Systems facilities for the purpose of evaluating radios for propagation characteristics and other matters in indoor environments. Depending up on the facility, the experiment would utilize spectrum from 2.6-4.2 GHz.
 - Name of vendor of product: Airspan Networks
2. Identification of the Commission proceeding in which the information was submitted.
 - OET STA License Application File: Form 442 File Number 1022-EX-CN-2020
3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.
 - The information is a commercial trade secret. Knowledge that Cisco is experimenting with 5G waveforms for indoor deployments is commercially valuable information that could be used by competitors.
4. Explanation of the degree to which the information concerns a service that is subject to competition.
 - The information concerns a service that is highly competitive in the United States and globally. 5G radio systems in the 3 GHz range are manufactured by major vendors such as Nokia, Ericsson and Huawei.
5. Explanation for how disclosure of the information could result in substantial competitive harm.
 - The information contained in the document presents information about a conceptual product that is being evaluated for possible commercial development. If competitors were to have access to this document, they would have knowledge of Cisco's pending business plans, and potentially would be able to use this advance knowledge to their advantage. This could result in substantial competitive

harm to Cisco's ability to bring a product to market, should that decision be made.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure.
• Cisco manages its product development to ensure that competitors do not get early access to details about forthcoming products. Information about Cisco's products under development including engineering development or demonstration tools is considered by the company to be commercially sensitive information that employees are not permitted to discuss outside the company.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of information to third parties.
• Information about product development is not routinely provided to the public, and is not available on Cisco's website. No information about this product has been disclosed.

8. Justification of the period during which the submitting party asserts that material should not be available for public disclosure.
• Cisco requests that the above-identified material not be disclosed for 2 years. This period should provide sufficient time for Cisco to make its evaluation of the product.

9. Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.
• Cisco has not offered a comparable solution in the marketplace in the past. Even the knowledge that Cisco is evaluating market entry, and has obtained a STA, would be valuable market information for existing solution providers.

Sincerely,

Louie Castro
Hardware Engineer Compliance Manager
Locastro@cisco.com
408-527-6921