

COUNTY INFORMATION SERVICES
500 N. Capital of Texas Hwy, Building 4-100
Austin, Texas 78746

May 28, 2020

By Electronic Filing

Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Attention: Office of Engineering and Technology
Experimental Licensing Branch

Re: County Information Services
Application for Renewal of WH2XWU
Request for Confidential Treatment

On May 28, 2020, County Information Services (“CIS”) filed the above-referenced application for renewal of its experimental license with the Commission. CIS requests confidential treatment of its “Renewal Exhibit” containing the experiment schedule to date, its technical design, experimental results, and future plans (the “Confidential Information”) pursuant to Section 0.459 of the Commission’s rules.

1. Information Subject to this Request for Confidential Treatment

CIS requests confidential treatment for the Renewal Exhibit. This document contains specific information about the technical parameters to be used in continuing CIS’s experiment, including the experimental design, antenna specifications, and trade secrets belonging to CIS or its technical consultants. CIS does not seek confidential treatment for elements of the application that have been filed without a request for confidentiality using the Experimental Licensing System or the emergency contact information provided with the application.

2. Relevant Commission Proceeding

This information is submitted in support of the application for renewal of experimental license WH2XWU.

3. Explanation of the Nature of the Confidential Information

Certain designs, practices, and techniques described in the Renewal Exhibit constitute trade secrets of CIS and its contractors.

4. Competition in the Relevant Service

The business of wireless data transmission remains extremely competitive and a successful experiment would provide a significant benefit for CIS.

5. Substantial Competitive Harm

Disclosure of the information in the materials could give CIS’s competitors an unfair advantage and discourage the investment of time, effort, and expense in the potential discovery and development of communications processes and technology.

6. CIS Has Taken Substantial Measures to Prevent Unauthorized Disclosures

CIS has disclosed the Confidential Information only to its personnel, its attorneys, and its technical consultants. These parties have agreed to prevent unauthorized disclosure of the information or are bound by professional confidentiality requirements.

7. Prior Disclosure of the Confidential Information

CIS has not made the information in the Renewal Exhibit available to the public and it is not generally available from any other source.

8. Justification of the Protection Period

CIS requests that its Confidential Information be withheld from public inspection indefinitely because CIS should be entitled to the benefits of its experimental designs and conclusions until such time as CIS has developed a business plan that requires disclosure.

9. Additional Information

The Commission should encourage the development of more efficient and cost-effective methods of data transmission. Providing experimenters with the protection of their proprietary information during the course of experiments supports that goal. Additionally, the public interest is not served by disclosure of the Confidential Information.

Accordingly, this material qualifies for confidential treatment under the Commission's rules. CIS requests that the material be withheld from public inspection and asks that the Commission process any request for disclosure pursuant to the terms of Section 0.461 of the Commission's rules.

Respectfully submitted,

/s/

Richard Reeuwijk

Director

COUNTY INFORMATION SERVICES