

CONFIDENTIALITY REQUEST
Special Temporary Authorization
DRS Sustainment Systems, Inc.

DRS Sustainment Systems, Inc. (“Company”) respectfully requests that the Commission grant confidential treatment of its filing for a Special Temporary Authorization (“STA”) on May 13, 2019 and of certain information and documents provided in its responses to the STA electronic application form (“Responses”) because this information is competitively sensitive and its disclosure would have a negative competitive impact on the Company were it made publicly available. Such information would not ordinarily be made available to the public and should be afforded confidential treatment under 47 C.F.R. §§ 0.457 and 0.459.

47 C.F.R. § 0.457

Specific information in the Responses is confidential and proprietary to Company as “trade secrets and commercial or financial information” under Section 47 C.F.R. § 0.457(d). Disclosure of such information to the public would risk revealing company-sensitive proprietary information in connection with Company’s ongoing business and operations.

47 C.F.R. § 0.459

The fact of the Company’s filing and the specific information in the Responses is subject to protection under 47 C.F.R. § 0.459, as demonstrated below.

Information for which confidential treatment is sought:

Company requests that the fact of its filing of the STA on May 13, 2019, and specific information in the Responses and associated documents be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. The information designated as confidential includes Company’s sensitive financial information (Responses 4 and 5) and sensitive trade secrets and commercial information, including information about Company’s customers, internal policies, and business structure and strategy (Responses 4,5,6,7,8,). This information is competitively sensitive information that Company maintains as confidential and is not normally made available to the public. Release of the information and associated documents would have a substantial, negative impact on Company since it would provide competitors with commercially sensitive information. As required by 47 C.F.R. § 0.459, Company will indicate confidential information in its Responses by marking it “**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.**”

Commission proceeding in which the information was submitted:

The information is being submitted as part of Company’s STA Application, submitted on May 13, 2019.

Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged:

The information designated as confidential includes sensitive financial information and sensitive trade secrets and commercial information. As noted above, the information is competitively sensitive information and is not normally released to the public. As such, its release would have a substantial negative competitive impact on Company.

Degree to which the information concerns a service that is subject to competition and manner in which disclosure of the information could result in substantial harm:

The market for the services Company provides is competitive; thus, the release of this confidential and proprietary information would cause Company competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of Company's business at a level of detail not currently available to the public.

Measures taken by Company to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosures of the information to third parties:

Company has treated and continues to treat the non-public information identified as confidential in these Responses as confidential and has protected it from public disclosure to parties outside of the company.

Justification of the period during which Company asserts that the material should not be available for public disclosure:

Company cannot determine at this time any date on which this information should not be considered confidential.

Other information Company believes may be useful in assessing whether its request for confidentiality should be granted:

Under applicable Commission decisions, the information in question should be withheld from public disclosure.



Richard A. Marquard
Director, Contracts & Compliance
DRS Sustainment Systems, Inc.

May 15, 2019