



October 31st, 2014

Mr. Behnam Ghaffari
Office of Engineering and Technology (OET)
Federal Communications Commission
445 12th Street, SW
Washington,, DC 20554

Re. REQUEST FOR CONFIDENTIAL TREATMENT

Exelis Inc.

Dear Mr. Behnam

Per requirement, this letter lists the answers to the nine questions per CFR 47, Part 0.459(b) on information to be withheld from public inspection. This confidentiality is in reference to two submitted documents:

- 1.) Exhibit A PAR Description
- 2.) Exhibit B PAR Sensor.

Purpose for submitting documents is to assist OET to better understand our overall technical design and to meet submittal requirements in providing a dimensional drawing of the antenna structure (Exhibit B PAR Sensor).

Exelis Incorporated regards this information as commercially sensitive.

In conformity with Section 0.459(b) of the Commission's rules, 47 C.F.R. § 0.459(b), ITT Exelis Inc. submits the following:

- 1.) *Identification of the specific Information for which confidential treatment is sought;*

Exelis requests confidential treatment of the attachments: "Exhibit A PAR Description and Exhibit B PAR Sensor documents.

- 2.) *Description of the commission proceedings in which the information was submitted or a description of the circumstances giving rise to submission;*

Exelis provided this information to assist in the approval of our OET license application.

- 3.) *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged;*

The detailed description data of the Precision Approach Radar (PAR) system contains confidential, technical and commercial information not made available to the public or competitors. The combination and use of commercial and customized subsystems that make up the radar system our unique to Exelis design.

- 4.) *Explanation of the degree to which the information concerns a service that is subject to completion;*
Besides PAR system design and development, we continually service maintenance contracts with current and legacy PAR systems. Subsequently, technical and commercially sensitive information regarding our systems could be divulged and abused by competitors resulting in significant financial impact.
- 5.) *Explanation of how disclosure of the information could result in substantial competitive harm;*
The general information, operational and functional description contains technical data which is monitored and regulated by US Government Rules and Regulations. This data is regulated by the Department of Commerce under Export Administrations Regulations (EAR) or by the State Department under International Traffic in Arms Regulations (ITAR). Violation of these rules and regulations domestic and/or foreign could be detrimental not only to Exelis Inc. in an unfair manner but also to national security.
- 6.) *Identification of any measure taken by the submitting party to prevent unauthorized disclosure;*
Documentation in question is physically marked with EAR, ITAR and/or Proprietary statements.
- 7.) *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties;*
This data is/and has not been publicly available. It is only released to our customers for self-maintenance/service of their specific system.
- 8.) *Justification of the period during which the submitting party asserts that material should not be available for public disclosure;*
To prohibit violation of US Government Rules and Regulations and Exelis Inc. Proprietary information, specific data should be permanently withheld from public disclosure.

Respectfully,

Forrest Pierson
Frequency Manager
Sr. Support Cable Engineer
Electrical Engineering
818.901.2457
forrest.pierson@exelisinc.com