

Date: 13 September 2019
Subject: Public and Redacted Version of Request for Confidential Treatment and
Complementary Exhibits
File Number: 1731-EX-ST-2019

Federated Wireless, Inc. (Federated Wireless), pursuant to 5 U.S.C. § 552 and Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§ 0.457, 0.459, hereby requests that certain information complementary to its above-referenced application for Special Temporary Authority (STA) be treated as confidential and not subject to public inspection. The designated information constitutes confidential and proprietary information that, if subject to public disclosure, would cause significant commercial, economic, and competitive harm to Federated Wireless. As described below, Federated Wireless's request satisfies the standards for grant of such requests set forth in Sections 0.457 and 0.459 of the Commission's Rules.

In accordance with Section 0.459(b) and in support of this request, Federated Wireless provides the following information:

1. Identification of the information for which confidential treatment is sought:

Federated Wireless's request for confidential treatment is limited to information that has been redacted from the STA and Exhibits A and B, which information is highlighted and underlined in such exhibits. Federated Wireless does not seek to withhold from public inspection information in the STA and associated exhibits necessary for interference mitigation, including applicant name, contact information, test location, frequency, output power, effective radiated power, emission characteristics, and modulation.

2. Identification of the circumstance giving rise to the submission

Federated Wireless is submitting an application for Special Temporary Authority to perform testing in the 3.5 GHz band

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged:

The information requested to be kept confidential has significant commercial and financial value to Federated Wireless. The exhibits supporting the STA discuss tests/experiments that include trade secret information. The Commission has clarified that confidential treatment should be afforded to trade secrets. Federated Wireless's tests and experiments and proprietary wireless applications using particular radio frequency equipment and shared spectrum technology represent "secret commercially valuable plan[s]" within the meaning of a trade secret as recognized by the Commission.

4. Explanation of the degree to which the information concerns a service that is competitive:

Federated Wireless is requesting an STA to conduct testing in connection with its administration of a Spectrum Access System (SAS) in the 3.5 GHz band. SAS Administrators compete vigorously on the basis of their products in this band.

5. Explanation of how disclosure of the information could result in substantial competitive harm

The technology under test is very sensitive and confidential in nature. Disclosure of the redacted information could cause substantial competitive harm to Federated Wireless, because it would provide competitors insight into confidential research, development, operational, and strategic information that would not otherwise be available, which would work to Federated Wireless's severe competitive disadvantage.

6. Identification of any measures taken by the requesting party to prevent unauthorized disclosure.

Federated Wireless routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

7. Identification of whether the information is available to the public and the extent of any previous disclosures of the information to any third parties

The information contained in the confidential exhibits is not available to the public, and has not previously been disclosed to third parties.

8. Justification of the requested period of confidentiality

Federated Wireless requests that the redacted information be treated as confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to Federated Wireless.

Consistent with 47 C.F.R. § 0.459(d)(1), Federated Wireless requests notification if release of the information subject to this request is requested pursuant to FOIA or otherwise, so that Federated Wireless may have an opportunity to oppose grant of any such request.

Respectfully submitted,

/s/ Jennifer M. McCarthy
Jennifer M. McCarthy
Vice President, Legal Advocacy
Federated Wireless, Inc.

Exhibit A – Special Temporary Authority Justification:

Consistent with the standards set forth in Section 5.61 of the Federal Communications Commission's (Commission's) Rules, 47 C.F.R. § 5.61, Federated Wireless requests Special Temporary Authority (STA) to [REDACTED] [REDACTED] Operations under this STA would be consistent with the Part 96 rules the Commission has adopted to govern use of the 3.5 GHz band. The STA is sought for a period of 180 days beginning on September 30, 2019. Federated Wireless outlines below its need for the requested STA and the reasons that the STA should be granted expeditiously.

[REDACTED] The operation [REDACTED] will be consistent with the Commission's Part 96 rules and the incumbent operators will be protected from any harmful interference.

Federated Wireless requests authorization to operate on a 10 MHz channel in the frequencies between 3650-3700 MHz, a subset of the frequencies that have been opened for innovative spectrum sharing in connection with the new Citizens Broadband Radio Service (CBRS). As stated above and described below, Federated Wireless will avoid harmful interference to incumbent operations throughout the band, and to operations in adjacent bands.

Operation is requested within circular areas with 20km diameter and centered in Los Angeles, CA (34.0522N, 118.2437W), Philadelphia, PA (39.9526N, 75.1652W), Chicago, IL (41.8781N, 87.6298W), and Denver, CO (39.7392N, 104.9903W).

Federated Wireless is aware that other stations may be licensed for operation in the 3650-3700 MHz band and if any interference occurs, Federated Wireless will be subject to immediate shut down.

Federated Wireless will be responsible for ensuring that transmitters are used only in authorized locations and in a manner authorized under the requested STA.

Planned Operations

Federated Wireless anticipates performing the following tests under the requested STA. The proposed experimental operations in the 3.5 GHz band will be conducted without harmful interference to other authorized users.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Non-Interference Analysis

Operation under the STA will not adversely impact any authorized user of RF Spectrum.

Federal Radar Protection: Because the transmitters will operate only in 3650-3700 MHz, Federated Wireless does not expect any interference to Federal Radars that operate in 3550-3650 MHz.

Federal Government Quiet Zones and Exclusion Zones: The proposed test sites are far from designated Quiet Zones (QZs) listed in section 1.924 of the Commission's rules and that require protection. Further, the proposed test sites are far from the Exclusions Zones (EZs) that must be maintained for protection of federal Incumbent Users, as required by section 96.53(e). Therefore, no interference to incumbent operation within these zones is expected due to operation under the STA.

International Border: The proposed test sites are far from the Canadian and Mexican borders. Therefore, no interference to incumbent operations is expected for international operation.

FSS Protection: The Commission has identified in-band Fixed Satellite Service ("FSS") operations in 3600-3700 MHz and adjacent band FSS operations in the 3700-4200 MHz that require protection under Part 96. Federated Wireless will access the FCC's database on protected FSS earth stations (<https://api.fcc.gov/rest/fss/v1/allsitedata>) to determine associated FSS earth station parameters and notify the registered users in the proposed geographic areas prior to operation in this band. Subsequently, Federated Wireless will coordinate an agreement with the grandfathered earth station licensees prior to operation in 3650-3700 MHz band and/or maintain operation separation from these

grandfathered earth stations to ensure that the operation will not cause harmful interference to any existing registered stations in the 3650-3700 MHz band.

Part 90 (GWBL): Federated Wireless will follow the procedures established in Wireless Telecommunications Bureau and Office of Engineering and Technology Announce Methodology for Determining the Protected Contours for Grandfathered 3650-3700 MHz Band Licensees, GN Docket No. 12-354, Public Notice, DA 16-946 (WTB/OET 2016) to determine the potential location of Grandfathered Wireless Broadband Licensees. Subsequently, Federated Wireless will maintain operation separation from these GWBLs to ensure that operations under the requested STA will not cause harmful interference to any existing registered stations in the 3650-3700 MHz band.

Exhibit B – Technical Information:

Applicant Name: Federated Wireless Inc.

Applicant FRN: 0024199457

Legal Contact Details:

Name of Contact	Kurt Schaubach
Contact Address	4075 Wilson Boulevard, 9 th Floor Arlington VA 22203

Technical Contact Details:

Name of Contact	Sam MacMullan
Contact Address	4075 Wilson Boulevard, 9 th Floor Arlington VA 22203

Transmitter General Information:

Equipment	[REDACTED]
Quantity	[REDACTED]
Area of Operation	Operation not to exceed 20 km from the following geographic center points: 34° 3' 8" N, 118° 14' 5" W 39° 57' 9" N, 75° 9' 55" W 41° 52' 41" N, 87° 37' 47" W 39° 44' 21" N, 104° 59' 25" W
Antenna	External
Type	Omnidirectional

Modulation	Emission Designator	Bandwidth	Maximum Output Power	Maximum EIRP	Mean/Peak
CW	10M0N0N	10 MHz	6.3 W	50 W	Peak