

General Atomics Aeronautical Systems

STATEMENT OF REASONS FOR WITHHOLDING SOME INFORMATION IN THE APPLICATION FILE NO. 0005-EX-PL-2012

General Atomics Aeronautical Systems Inc.(GA-ASI) requests that the information in its application file number **0005-EX-PL-2012** be protected under The Freedom of Information Act 5 U.S.C. § 552, (b) (4) . Per § 0.459 (a) (2) of FCC regulations, the following is the item by item information as requested in § 0.459 (b)

1) Identification of the specific information for which confidential treatment is sought;

Confidentiality is requested for the name and the purpose of the program. Also protection is sought for all details of waveform and antenna that are not necessary for the application

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission;

The information is part of an Experimental License application

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

The information is trade secrets that GA-ASI wants to protect from competitors. This technology is state of the art and no company has a working deployed product. Potentially in the future this information may be restricted by US government

(4) Explanation of the degree to which the information concerns a service that is subject to competition;

The information is not part of a competitive service

(5) Explanation of how disclosure of the information could result in substantial competitive harm;

The disclosure of this information would put GA-ASI at a substantial competitive disadvantage. Multiple companies are attempting to design similar products. Releasing GA-ASI design details would help these competitors

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure;

Within the company, this information is considered proprietary. No disclosure outside the company is allowed without a non-disclosure agreement (NDA) that forbids disclosure to a third party

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties;

The information was never disclosed to the public. Third parties were given some information under NDA

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure; and

The request is to keep the information confidential for 7 years. This period is needed to ensure that the technology development and deployment phase has been carried out, and hence the status of this technology is well understood from a competitive and security perspectives

(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.

The eventual customer for this technology is expected to be US Government. It is expected the US Government will place restrictions on the technical details of the solution