

July 22nd, 2016

Federal Communications Commission
Office of Engineering and Technology

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Confidentiality Request Concerning Test License Application for AR55-B

Pursuant to Sections 0.457 and 0.459 of the Commission's Rules, we hereby request confidential treatment of information accompanying this application as outlined below:

Exhibit Type	File Name
Scope and Objective of FCC Test License Application	Scope and Objective of FCC Test License Application.pdf

The information contained in the document listed above is similar in scope to the information requested for confidentiality in the original manufacturer's approved Test License Application 0169-EX-PL-2016. The original manufacturer is ADC Automotive Distance Control Systems GmbH, which is part of the Continental group and a 100% subsidiary of Continental AG. In collaboration and agreement with ADC Automotive Distance Control Systems GmbH, we are requesting this confidentiality such that we are not publically disclosing any additional information that their approved license has publically disclosed.

According to §0.459(b), we make our request based on the following reasons for withholding the materials from inspection:

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

The entire scope and objectives of the test experiment to be conducted under this application; as indicated in the above mentioned exhibit.

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

Application for OET EXPERIMENTAL LICENSE using Form 442.

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

The knowledge and information are privileged and restricted to solely ADC Automotive Distance Control Systems GmbH and its customers. General Motors is the customer in this case.

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

Not applicable. The functionalities that we test (Forward Collision Alert, Full Speed Range Adaptive Cruise Control and Collision Imminent Braking) are already public, however, a new hardware generation is used.



GENERAL MOTORS

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

It provides privileged knowledge to ADC Automotive Distance Control Systems GmbH competitors of their research and development progress and plans, thereby giving them a competitive advantage.

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

Such information and knowledge are strictly protected and limited to ADC Automotive Distance Control Systems GmbH employees and customers. General Motors is the customer in this case.

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

Information has not been publicized and ADC Automotive Distance Control Systems GmbH contracted third parties are bound by Non-Disclosure Agreements. For customers involved, development contracts exist. General Motors is the customer in this case.

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

The duration of the entire experimental license shall cover the time until the market introduction, which is January 2019.

(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 Advanced Driver Assistance Systems market is attractive and a fast growing one. Hence, the timing and progress of ADC Automotive Distance Control Systems GmbH product research and development (R&D) process, and its discretion making it public contributes critically to the overall success of the product launch. Any premature leak of such information to ADC Automotive Distance Control Systems GmbH competitors may undercut the competitive advantages that ADC Automotive Distance Control Systems GmbH possesses.



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