



HARRIS CORPORATION

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Federal Communications Commission
Office of Engineering and Technology
445 12th Street SW
Washington DC 20554

Dear Mr. Ghaffari

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 three submitted documents:

- 1.) Exhibit B Description
- 2.) Exhibit C Sensor Dimensions
- 3.) Exhibit D Waveform-pulse data

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 C PAR Sensor).

Harris Corporation 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), Harris Corporation submits the following:

- 1.) *Identification of the specific Information for which confidential treatment is sought;*
Harris requests confidential treatment of the attachments: "Exhibit A: PAR Description, Exhibit B: PAR Sensor and Exhibit C: Frequency Modulation and Bandwidth documents".

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

- 4.) *Explanation of the degree to which the information concerns a service that is subject to competition;*
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 Harris Corporation 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 Harris Corporation, Proprietary information, specific data should be permanently withheld from public disclosure.
- 9.) *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted;*
Due to the Commission's rules (47 CFR Section 0.459 et seq.) allowing specific material in applications to be kept confidential, these Harris documents outlined above are within the "trade secret and commercial or financial information" category of material that should not be made available for public inspection. 47 CFR, Section 0.457(d).

Sincerely,



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