



Dahni-El Giles
HEVO Inc.
15 Metrotech Center, Fl. 19
Brooklyn, NY 11201
dahni-el@teamhevo.com

Via E-filing

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Federal Communications Commission
Office of Engineering and Technology
Experimental Licensing Branch
445 12th St., S.W.
Washington, DC 20554

Re: Application File #0241-EX-ML-2014 - §0.459 Requests that materials or information submitted to the Commission be withheld from public inspection.

To Whom It May Concern:

Pursuant to 47 C.F.R. Section .459(b), the Applicant seeks confidential treatment to all information, schematics, illustrations, measurements, materials, type, positioning, alignment, and processes, research, designs, data, plans, drawings, sketches, formulas, developmental or experimental work, computer programs, algorithms, computer processing systems and techniques related to the Applicant's wireless charging system for electric vehicles, which include, but are not limited to, simulated circuits, the wireless link, coils, chassis and wheels, tools and simulation, magnetic field, and the magnetic flux density (collectively referred to as "Confidential Information" as submitted and described in application 0241-EX-ML-2014 (the "Application")).

The Confidential Information disclosed in the Applicant is of considerable commercial value because the subject matter arose out of the Applicant's significant research and development efforts, which Applicant is now preparing for commercial applications. In this regard, the Applicant applied for the experimental license 0127-EX-PL-2014 with the Commission, and provided such Confidential Information, in order to bring new products to market. The Commission approved Applicant's request for confidentiality related to experimental license 0127-EX-PL-2014. In continuation of the same research, development, and preparation for commercialization, Applicant seeks to modify the license solely to add further testing locations while still seeking confidential treatment of Confidential Information.

Applicant hereby attaches and encloses a redacted copy of the original Application and/or exhibit, which Applicant requests the Commission use in responding to any requests for public inspection. The redacted materials include only such Confidential Information as Applicant requests to be treated as confidential. The rationale for withholding the Confidential Information from public inspection is more fully set forth below.

1. Identification of Confidential Information (47 CFR §0.459(b)(1))

Notwithstanding the definition of Confidential Information above, Applicant hereby identifies the specific information subject to confidential treatment:

- Magnetic Flux Density of a 1.5 kW Resonant Wireless Link:
 - Simulated Circuit:
 - The simulated circuit of the wireless charging link of transmitter and receiver. The circuit showing the resonant circuit with inductance representing the coils (transmitter and receiver) and capacitance attached to the coils (transmitter and receiver).
- Schematic of Wireless Link:
 - According to the desired vehicle used for the pilot program, the transmitter is embedded/ surface mounted on the street/ pavement and receiver is mounted on the bottom/ chassis of the vehicle
- Coils:
 - The internal alignment of the coils, inside the enclosure (sealed/ proper insulation).
- Dimension of Chassis and Wheels of the desired vehicle.
- Tools and Simulation:
 - The tools and simulation for finite elements analysis performed on the platform of ANSYS Maxwell 2014 version. The magnetic flux density, magnetic field strength, and other various factors that were identified by this software. Including, but not limited:
 - The volume of vacuum region
 - Number of elements
 - Shape of elements
 - Minimum edge length
 - Minimum volume
 - Simulation time
 - Simulation frequency
- Magnetic Flux Density [T]
 - Applicant generated a 2D graph (x-y plane) of the magnetic flux density view between the transmitter and the receiver coils with the help of Maxwell software after the simulation. The color variation shows the magnetic flux density between the coils.
- Measurement Lines for the Magnetic Flux Density
- Measurement Positions for the Magnetic Flux Density
- Nomenclature
 - General population/uncontrolled: apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure.
 - Occupational/controlled: apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over the their exposure.
- Magnetic Flux Density on y-z Plane for Different Heights
- Action frequency rates
- Location of pilots, specifically the latitude and longitude

2. Submission of Confidential Information (47 CFR §0.459(b)(2))

The Confidential Information was originally submitted to the Commission on or about February 27, 2014 as part of the Application, no. 0127-EX-PL-2014. The Application was submitted in support of Applicant's request for an experimental license, which license is being sought based on guidance from the

Commission. The modification of the original license was submitted on or about December 17, 2014 resulting in new license # 0241-EX-ML-2014, in which Applicant seeks to add further testing locations.

3. Trade Secret and Commercial Information (47 CFR §0.459(b)(3))

The Confidential Information identified in the Application, as well as in this letter, was discovered and developed over two years of research, testing, and exploration at significant financial cost and commitment of time. The Applicant established a research and development relationship with a local University in 2012 to study wireless power transfer using magnetic resonant and induction coupling technologies. This phase of the project was called Phase 0, as it was period to complete a proof of concept on wireless power transfer, which the research team successfully completed in February 2013. After the completion of Phase 0, the University and Applicant entered into another research and development agreement to continue their collaboration on determining the proper coil size and weight, measurements and positioning of the wireless power transmitter and receiver, shielding methods for the magnetic flux density, and etc. to create commercial applications of wireless transfer power.

The secrecy and security of the Confidential Information is vigilantly safeguarded by Applicant, and the Confidential Information is not generally known outside of Applicant's organization. By way of example, and not limitation, Applicant takes the following steps to protect the Confidential Information: the Applicant requires all third parties, as well as independent contractors and/or employees, to enter into confidentiality agreements prior to accessing or receiving any of the Confidential Information, and then only such Confidential Information as is necessary under the circumstances is provided. Moreover, all independent contractors and/or employees have executed investor assignment and proprietary rights agreements prior to initiating work with the Applicant's research and development team. In addition, all visitors to the Applicant's lab must obtain approval from lead investigator, sign in with security, and sign confidentiality agreement. All or some of the Confidential Information is subject to a confidential non-provisional patent application filed in the United States Patent and Trademark Office seeking patent protection for its methods of wireless power transfer. Applicant would be at a substantial disadvantage with its competitors if the Confidential Information provided in the Application was publicly available before such filings in the USPTO were published, where pursuant to 35 U.S.C. 122, patent applications maintain confidentiality for 18 months from the filing date.

The Applicant derives significant competitive advantage and potential and/or actual financial benefit from the fact the Confidential Information is not available to the public, including Applicant's competitors. Applicant estimates the financial value of the Confidential Information to be in excess of \$5,000,000 and Applicant would suffer significant financial loss and competitive harm were the Confidential Information to be made available to the public, including specifically Applicant's competitors.

4. Competitive Services 47 CFR §0.459(b)(4)

Presently, the Applicant is a part of a burgeoning wireless charging market, where competing companies are exerting a vast amount of resources to bring wireless charging of electric vehicles to market. At this stage, disclosure of the Applicant's subject matter will bring substantial harm to it since Applicant's competitors could alter their materials and measurements based off of the subject matter to improve their services and products, and potentially accelerate their commercialization ahead of the Applicant's. In addition, if competitors have access to confidential information, they could effectively reduce costs, improve efficiency, and/or alter their design that would effectively erase any competitive advantage that the Applicant may possess.

To reiterate, the information and subject matter that the Applicant seeks to have marked confidential is not available to the public. Regarding disclosures to third parties, the Applicant has not disclosed confidential information without first entering into a confidentiality agreement and such disclosure was necessary to determine pricing of the subject matters commercial viability.

Under Section .459(b)(8), the Applicant requests the subject matter shall not be disclosed to the public for twenty-four (24) months from the filing date of the experimental license, application 0241-EX-ML-2014. The applicant seeks a 24 month confidentiality period to provide it protection as it files patent applications with the USPTO pertaining to subject matter involved in this application.

The Applicant has made it a priority to cooperate and work with the Commission and kindly asks the Commission to accept its request to protect the confidential information provided in application 0241-EX-ML-2014. Lastly, the Applicant believes it provided the Commission with useful information to assess and grant the request for confidentiality. If the Commission seeks additional clarification or information, the Applicant is happy to provide additional reasoning or information on the merits of its request. This request is being filed and submitted electronically within 30 days of the submission of application 0241-EX-ML-2014.

Respectfully submitted,

/s/ Dahni-El Giles

Dahni-El Giles
Legal & Operations
HEVO Inc.