



AEROSPACE

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Exhibit 1 for Consideration

12 June 2026

Subject: Request for Long-Term Confidentiality
Reference: STA Filing 1137-EX-ST-2026

To Whom It May Concern:

Pursuant to §§ 0.457(d) and 0.459 of the Commission's Rules, Honeywell International hereby requests that certain information included in referenced application for Special Temporary Authority 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.

In accordance with Section 0.459(b) and in support of this request, Honeywell International submits the following information:

47 C.F.R. 0.459(b)(1)

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

· Honeywell International seeks confidential treatment for the following exhibits: Exhibit 2: Radar Interference Analysis.

47 C.F.R. 0.459(b)(2)

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

· The above-referenced Exhibit is being submitted to the Commission in support of an Application for Special Temporary Authority. This exhibit is being filed contemporaneously with this request for confidentiality in response to a request from the Commission following the initial submission of this application. For additional information, please see File No. 1137-EX-ST-2026.

47 C.F.R. 0.459(b)(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 value consisting of testing, approaches, and conclusions representing critical business knowledge. The details of the attached Exhibit include trade secret information, and the Commission has clarified that confidential treatment should be afforded to trade secrets.

In addition, agreements entered into between Honeywell and parties that provided equipment and/or test units for testing require that confidential information of the parties be held in strict confidence, and that such information not be disclosed to any third party (with limited exceptions not applicable to this request). The data, analysis, and underlying technologies constitute confidential trade secrets, technical information, and business information under the agreements. In addition to maintaining confidentiality of the information contained within the Exhibit, Honeywell is prohibited from sharing company identifiers or sensor names under the terms of the Non-Disclosure Agreement and has therefore redacted company and sensor names, logos, and identifiers from the Exhibit.

47 C.F.R. 0.459(b)(4)

The degree to which the information concerns a service that is subject to competition;

- The services and technologies that are the subject of this application for STA have not yet been fully developed but are expected to lead to material developments in markets subject to competition from multiple U.S. and non-U.S. third parties.

47 C.F.R. 0.459(b)(5)

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

- The technology under development is highly sensitive and confidential in nature. The release of such information would provide valuable insight into Honeywell's technology innovations and potential business plans and strategies. Public disclosure would jeopardize the value of the technology under examination by enabling others to utilize Honeywell's information to develop similar products in a similar time frame. Disclosure of this information would also result in a breach of confidentiality obligations to existing vendors.

47 C.F.R. 0.459(b)(6)

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

- Honeywell has taken steps to keep confidential the information set forth in the confidential Exhibit by limiting the number of people involved in the tests/experiments to only those on a "need to know" basis, and by limiting other external contacts to privileged and confidential communications. Honeywell has also required any third parties involved in the testing process to execute robust nondisclosure agreements.

47 C.F.R. 0.459(b)(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 contained in the confidential Exhibit is not available to the public, and has only been disclosed to third parties pursuant to the restrictive safeguards described above.

47 C.F.R. 0.459(b)(8)

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

· Honeywell expects that permanent confidential treatment will be necessary in order to protect its evolving business and technology strategies, and to honor the terms of the Non-Disclosure Agreement under which this data was generated and has been continually safeguarded.

47 C.F.R. 0.459(b)(9)

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

· Honeywell International submits that a grant of confidential treatment as requested would promote further innovation in radiofrequency technologies and would thereby serve the public interest.

The information subject to this request for confidentiality should not be made available for public disclosure at any time. There is nothing material that public review of this information would add to the Commission's analysis of Honeywell International's request for an experimental authorization. Moreover, public disclosure of the sensitive information in the confidential Exhibit to the STA request after the Commission has ruled on the Request for Confidentiality is not necessary for the Commission to fulfill its regulatory responsibilities.

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

Pursuant to 47 C.F.R. § 0.459(e), the Applicant respectfully requests that if the Commission denies this request for confidential treatment, the submitted materials be returned to the Applicant without consideration. The information for which confidentiality is sought is being submitted voluntarily and has not been made routinely available to the public.

Sincerely, 

Britt Piper
Director of Product Development
Honeywell International