

**REQUEST FOR WITHHOLDING INFORMATION
FROM ROUTINE PUBLIC DISCLOSURE**
File No. 1138-EX-ST-2015

The Intel Labs Group of Intel Corporation (“Intel”) requests pursuant to Section 0.459 of the Commission’s Rules that certain materials included within the above-referenced application for special temporary authority be withheld from routine public disclosure. In support of that request, Intel provides the following information:

Identification of materials to be withheld from routine public disclosure (§0.459(b)(1)): Intel requests that all of the information contained in Datasheet K-LC5 to the application be withheld from routine public disclosure. Intel does not seek to withhold from public inspection any information necessary for interference mitigation, including the applicant name, contact information, locations, frequencies and power levels.

Identification of the Commission proceeding in which the information was submitted (§0.459(b)(2)): The material has been submitted in connection with the Intel application for special temporary authority that has been assigned File No. 1138-EX-ST-2015.

Explanation of the degree to which the information is commercial or financial, or contains a trade secret, or is privileged (§0.459(b)(3)): The information within Datasheet K-LC5 is typically not shared with public and contains information that is considered intellectual property which could be used by competitors to gain market advantage.

Explanation of the degree to which the information concerns a service that is subject to competition (§0.459(b)(4)): The information for which confidential treatment is sought contains intellectual property which should not be shared and “would customarily be guarded from competitors.” *See* 47 C.F.R. §§ 0.459(a)(4), 0.457(d)(2).

Explanation of how disclosure of the information could result in substantial competitive harm (§0.459(b)(5)): Public disclosure of the commercially-sensitive, proprietary, and confidential operational and technical information set forth in the Datasheet K-LC5 would cause competitive harm. The wireless industry is highly competitive, and thus competitors always are interested in learning information about device prototypes of others in order to gain a competitive advantage.

Identification of any measures taken by the submitting party to prevent unauthorized disclosure (§0.459(b)(6)): Intel will not be disclosing to the public the information contained in Datasheet K-LC5. Those Intel employees receiving the devices for testing will be instructed on the need to maintain confidentiality regarding the nature and source of the device, and all Intel contractors and partners that receive the devices are subject to confidentiality agreements.

Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties (§0.459(b)(7)): Intel has not made the information subject to this request available to the public and does not routinely disclose such commercially sensitive information to the public or to third parties, and has established procedures to protect such information internally. Some of the details regarding the prototype devices that are the subject of the application have been disclosed to a very select group of potential partners, but in all cases pursuant to non-disclosure agreements. Intel voluntarily provides the information at this time with the expectation that it will be treated confidentially in accordance with the Commission's rules.

Justification of the period during which the submitting party asserts that material should not be available for public disclosure (§0.459(b)(8)): Intel requests that the information be held confidential during the period for which special temporary authority for experimental operations is requested, and thereafter until such information no longer is deemed confidential and proprietary by Intel and no longer subject to Intel's internal procedures for maintaining its confidentiality.

Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted (§0.459(b)(9)): The information for which confidential treatment is requested falls within Exemption 4 of the Freedom of Information Act ("FOIA"), which provides a statutory basis for withholding from public inspection "matters that are trade secrets and commercial or financial information obtained from a person and privileged or confidential." 5 U.S.C. § 552(b)(4).

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