

From: Doug Sherman

To: Behnam Ghaffari

Date: December 01, 2010

Subject: FCC File No. 0551-EX-ST-2010

---

Message:

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

The detailed experiment description, which was submitted as an attachment to an application for a Special Temporary Authorization (STA).

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

An application for a STA with the Office of Engineering and Technology, 0551-EX-ST-2010.

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

The information reveals some of ITT's technical and programmatic thrusts, and is privileged information that has not been publicly released.

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

The information does not concern a service regulated by the FCC that is subject to competition.

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

Disclosure would provide ITT's competitors with information about what ITT is doing and why. Release of such information could irreparably harm ITT's competitive advantage.

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

This information is kept either physically secure or on computer systems that have restricted access. Access is given only to authorized ITT employees. Some of the information has been shared with vendors with which ITT has Non-Disclosure Agreements in place.

(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 is not available to the public. It has only been shared with third parties which have a Non-Disclosure Agreement with ITT.

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

ITT respectfully requests a 3-year confidentiality period consistent with our strategic plan to penetrate a critical emerging business opportunity.

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

Confidentiality is required to protect ITT's technical and programmatic thrusts in a very dynamic and

competitive environment.