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Federal Communications Commission
Office of Engineering and Technology
Experimental Licensing Branch

Re: Request for Confidential Treatment

ELS File Number: 0527-EX-CN-2026

Date: August 4, 2026

To whom it may concern,

Pursuant to Sections 0.457(d) and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457(d), 0.459, the undersigned individual applicant ("Applicant") respectfully requests that the portions of the single attachment identified in Item 1 below be withheld from routine public inspection. Those portions contain trade secrets and commercial information that is privileged and confidential within the meaning of Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4), and Section 0.457(d) of the Commission's rules.

Confidential treatment is not requested for the FCC Form 442 itself, for the Applicant's name or FRN, or for the station and technical parameters that appear in the Commission's Experimental Licensing System — including frequency ranges, emission designators, output power and effective radiated power, antenna characteristics, station location, and period of operation. Those parameters remain available for public inspection, and the public interest in transparency regarding authorized emissions is fully served without disclosure of the portions identified below.

A copy of this request is attached to and covers the material to which it applies, and all copies of that material, as required by Section 0.459(a)(1). A redacted version of the attachment, showing the withheld portions and leaving all remaining text visible, is submitted concurrently for the public file. This request itself is not confidential and contains no material for which confidential treatment is sought.

The statement of reasons for withholding the material from inspection, and of the facts upon which those reasons are based, is set forth below in question-and-answer form addressing each of the nine items enumerated in Section 0.459(b).

STATEMENT UNDER 47 C.F.R. § 0.459(b)

Item 1 — Identification of the specific information for which confidential treatment is sought

Q: *What specific information is the Applicant asking the Commission to withhold?*

A: Confidential treatment is requested for specified portions of one attachment to the above-referenced application — Form 442 Question 7: Experimentation Description (the “Question 7 Description”), the narrative exhibit describing the program of research and experimentation to be conducted under the requested authorization. The portions for which confidential treatment is sought are:

- (a) **Within Section 1 (Objectives):** the characterization of the specific applications and signal fusion that is being tested.
- (b) **Within Section 2 (Equipment and Theory of Operation):** the component description following the radio-frequency front-end entry; the numbered theory-of-operation sequence; and the paragraph describing the sensor-fusion subsystem; and
- (c) **Section 6 (Expected Outcomes):** in its entirety.

No other portion of the Question 7 Description is covered by this request. The balance of the attachment — including the statement of objectives, the station configuration, the antenna and radio-frequency front-end description, all frequency ranges and emission data, the maximum power limitation, the complete interference-mitigation and operational-constraint showing, and the requested term — remains available for public inspection. No other document on file is covered by this request.

The withheld portions are identified above by section and subject-matter reference only. No description of the substance of the withheld material is provided in this letter, and none is necessary for the Commission to act on this request.

Item 2 — Identification of the Commission proceeding, or description of the circumstances giving rise to the submission

Q: *In what proceeding or circumstance was this information submitted?*

A: The Question 7 Description was submitted as the sole attachment to an application for experimental radio service authorization filed under Part 5 of the Commission’s rules, 47 C.F.R. Part 5, through the Commission’s Experimental Licensing System (ELS), assigned File No. 0527-EX-CN-2026, under FRN 0038401642. The application is not associated with any docketed rulemaking or adjudicatory proceeding.

The attachment was prepared and submitted for the sole purpose of satisfying the Commission’s requirement that an applicant describe the program of research and experimentation to be conducted. See 47 C.F.R. §§ 5.53, 5.63, and FCC Form 442, Question 7. The Applicant

submitted the material because the Commission requires it as a condition of obtaining authorization and would not otherwise have disclosed it to any person.

The Applicant is an individual conducting self-funded research on personal time, using personally owned equipment, at personally controlled locations, and files in a personal capacity. No entity, employer, or third party is an applicant, licensee, or party in interest with respect to this application.

Item 3 — Degree to which the information is commercial or financial, or contains a trade secret or is privileged

Q: *To what degree is the withheld information commercial or financial, a trade secret, or privileged?*

A: The withheld portions of the Question 7 Description consist entirely of trade secret and confidential commercial information within the meaning of 5 U.S.C. § 552(b)(4) and 47 C.F.R. § 0.457(d).

1. **Trade secret.** The withheld portions disclose the architecture, methodology, and internal design conventions of an unpublished research and development effort. They describe how the Applicant's system is organized and operated, rather than merely what commercially available components it contains. That information derives independent economic value from not being generally known and is not ascertainable by proper means from inspection of commercially available equipment.
2. **Privileged and subject to statutory confidentiality.** The subject matter described in the withheld portions is the subject of a pending United States patent application. Patent applications are held in confidence by the United States Patent and Trademark Office under 35 U.S.C. § 122(a) until published or issued. The Applicant has not authorized publication or public disclosure. Public release of the withheld portions by the Commission would defeat the statutory confidentiality attaching to the corresponding patent application and would effect a public disclosure of unpublished invention subject matter by operation of an agency filing requirement rather than by the Applicant's choice.
3. **Commercial character.** Although the Applicant derives no revenue from the research (see Item 4), the information is commercial in character in the ordinary sense: it is technical know-how of a kind customarily held in confidence, having recognized value in a competitive technology market, and customarily licensed, assigned, or sold rather than published.
4. **Customary and actual treatment as private.** The information has at all times been customarily and actually treated as private by the Applicant and was provided to the Commission with the expectation that it would remain private. See *Food Marketing Institute v. Argus Leader Media*, 139 S. Ct. 2356 (2019). The measures supporting this are set out in Item 6.

Item 4 — Degree to which the information concerns a service that is subject to competition

Q: *Does the withheld information concern a service subject to competition?*

A: The Applicant states the following candidly.

The Applicant does not offer, and does not presently intend to offer, any commercial communications service. The Applicant has formed no business entity, has no customers, has received no compensation, and has entered into no commercial relationship of any kind in connection with this activity. The authorization sought is for non-commercial experimental operation only. In that narrow sense, the withheld information does not concern a “service” that the Applicant offers in a competitive market.

The information nevertheless concerns a technology segment that is subject to intense competition. Radio-frequency detection, signal characterization, and related sensing technologies are the subject of active commercial and government-sponsored development by numerous domestic and foreign firms and research organizations. Entities operating in that segment would derive competitive value from the withheld material. The Applicant’s interest in the information — including the ability to obtain, retain, and ultimately convey enforceable patent rights — is directly exposed to that competition.

The Applicant further notes that under Argus Leader, a showing that the information concerns a service subject to competition, or that disclosure would cause substantial competitive harm, is not a precondition to protection under Exemption 4 where the information is commercial and is both customarily and actually treated as private and provided to the government under an assurance of privacy. The Applicant addresses Items 4 and 5 in full nonetheless, as Section 0.459(b) requires.

Item 5 — How disclosure could result in substantial competitive harm

Q: *How would public disclosure of the withheld information cause substantial competitive harm?*

A: Public disclosure would cause immediate, substantial, and irreversible harm to the Applicant in at least four respects.

1. **Irretrievable loss of trade-secret status.** Trade-secret protection is lost upon public disclosure and cannot be restored. Placement of the withheld portions in a publicly accessible Commission file — indexed, searchable, and routinely mirrored by third-party aggregators — would extinguish the Applicant’s trade-secret rights in the disclosed subject matter permanently and without remedy.
2. **Loss and impairment of patent rights.** The Applicant has a pending patent application and a non-provisional filing deadline. Public disclosure of the invention subject matter would create prior art foreclosing patent rights in most foreign jurisdictions, which apply an absolute-novelty standard with no grace period, and would materially complicate

prosecution in the United States. The competitive value of the Applicant's work depends substantially on the availability of those rights.

3. **Appropriation of research investment without cost.** The withheld portions describe the results of a sustained investment of the Applicant's personal time and personal funds. Disclosure would allow competitors — including well-capitalized firms and foreign entities — to replicate the Applicant's architecture and methodology directly, without incurring the corresponding development cost, and to reach the market ahead of the Applicant or the Applicant's eventual assignee.
4. **Impairment of the Applicant's ability to convey rights.** The value of the intellectual property, and the Applicant's ability to convey it, is contingent on its confidentiality. Disclosure would substantially diminish or eliminate that value.

The Applicant additionally notes, as a matter bearing on the public interest rather than on competitive harm as such, that detailed disclosure of the methodology described in the withheld portions could assist parties seeking to defeat or circumvent detection techniques of the kind under study. The Applicant raises this consideration under Item 9 and does not rely on it as an independent basis for the request under Exemption 4.

Item 6 — Measures taken by the submitting party to prevent unauthorized disclosure

Q: *What measures has the Applicant taken to prevent unauthorized disclosure?*

A: The Applicant has treated the withheld material and its underlying subject matter as confidential from the time of creation and continues to do so. Specific measures include:

1. **Restrictive markings.** The attachment bears conspicuous markings identifying it as containing trade secret and proprietary information exempt from public disclosure, and prohibiting unauthorized review, use, disclosure, or distribution.
2. **Need-to-know distribution.** Distribution has been limited to the Commission in connection with this application, to the United States Patent and Trademark Office under the confidentiality of 35 U.S.C. § 122(a), and to legal counsel. The material has not been distributed to any commercial party, competitor, collaborator, or member of the public.
3. **Access-controlled storage.** The material and the associated research data are stored on access-controlled systems maintained by the Applicant. The research network is physically and logically isolated, with no route to the public internet and with authentication required for all access.
4. **Physical control.** All research equipment and records are maintained at locations under the Applicant's personal control, with physical access limited to the Applicant.

5. **No publication or public demonstration.** The Applicant has not published, presented, demonstrated, posted, or otherwise made public any part of the withheld material, and has deliberately refrained from doing so to preserve its confidentiality.
6. **Confidentiality obligations on any future recipient.** Should disclosure to any third party become necessary, the Applicant will require a written confidentiality obligation as a condition of that disclosure.

Item 7 — Whether the information is available to the public, and the extent of any previous disclosure to third parties

Q: *Is the withheld information publicly available, and has it previously been disclosed?*

A: No portion of the withheld material is available to the public.

The material has never been published, filed in any public record, posted to any public forum, presented at any conference, or otherwise released. There has been no previous disclosure to any third party other than: (a) submission to the Commission in connection with this application, accompanied by this request; (b) submission to the United States Patent and Trademark Office, where it is held in confidence under 35 U.S.C. § 122(a) and has not been published; and (c) disclosure to legal counsel in a confidential capacity.

The Applicant acknowledges that individual hardware components referenced in the narrative are commercially available and that their published datasheets are public. The Applicant does not seek, and does not claim, confidential treatment in the published characteristics of any commercially available component; accordingly, the antenna and radio-frequency front-end descriptions remain unredacted. What is confidential — and what is not derivable from public sources — is the integration, architecture, methodology, and research design described in the withheld portions, which are the Applicant's original work.

Item 8 — Justification of the period during which the material should not be available for public disclosure

Q: *For how long should the material be withheld, and why?*

A: The Applicant requests that the withheld portions be kept from public inspection for the term of the requested authorization and any renewals or modifications thereof, and thereafter until the earliest of the following events:

1. Publication of the corresponding patent application under 35 U.S.C. § 122(b), or issuance of a patent disclosing the subject matter, at which point the published subject matter enters the public domain and no further protection is sought as to that subject matter;
2. Voluntary public disclosure of the material by the Applicant; or

3. Written notice from the Applicant to the Commission that confidential treatment is no longer required.

This period is justified because the harms identified in Item 5 persist for exactly as long as the material remains unpublished, and cease as to any subject matter that the Applicant's own patent publication places in the public domain. The requested period is therefore self-limiting and tied to an objectively verifiable event rather than to an indefinite assertion of secrecy.

The Applicant commits to notify the Commission promptly when any portion of the withheld material enters the public domain by patent publication or otherwise, so that the Commission may release the corresponding material without further inquiry.

In the alternative, should the Commission prefer a fixed term, the Applicant requests an initial period of five (5) years from the date of grant, with leave to seek extension upon a showing that the material remains unpublished and confidential.

Item 9 — Any other information useful in assessing the request

Q: *What else should the Commission consider?*

A: The Applicant respectfully offers the following.

1. **The request is narrow and has already been self-limited.** Confidential treatment is sought for three passages within Section 2 and for Section 6 of a single attachment. The Applicant has not sought blanket withholding of the attachment. The FCC Form 442, the Applicant's identity and FRN, all station and technical parameters, and the entirety of the Applicant's interference-mitigation showing remain fully public. The Commission's file will therefore continue to show who is authorized to operate, on what frequencies, at what power, from what location, for what period, and under what constraints. The public interest in the transparency of authorized radio operations is preserved in full.
2. **A redacted version is provided.** Consistent with 47 C.F.R. § 0.459(a)(1), the Applicant submits concurrently a redacted version of the attachment in which the withheld passages are marked and all remaining text appears in the clear.
3. **Further narrowing is acceptable.** Should the Commission conclude that confidential treatment is not warranted as to any withheld passage, the Applicant requests that the Commission grant the request as to the remainder rather than deny it in whole, and afford the Applicant an opportunity to submit a further-redacted version before any material is placed in the public file.
4. **Notice before release.** The Applicant requests notice and an opportunity to respond, as provided in 47 C.F.R. §§ 0.459(d)(3), 0.459(e), and 0.461(d)(3), before any of the identified material is disclosed, and confirms its understanding that the material will be

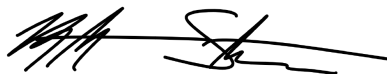
accorded confidential treatment under §§ 0.459(g) and 0.461 pending final action and the exhaustion of any review or stay proceedings.

5. **Non-commercial, individual applicant.** The Applicant is an individual, not a corporation, and has no institutional capacity to absorb the consequences of an uncompensated public disclosure of years of personal research. The research is self-funded. No federal funds, facilities, equipment, personnel time, or non-public information have been used in connection with it.
6. **Security-adjacent subject matter.** As noted in Item 5, detailed public disclosure of the methodology described in the withheld portions could assist parties seeking to defeat the detection techniques under study. The Applicant offers this as a consideration bearing on the public interest and stands ready to respond to any inquiry from the Commission or any other federal authority regarding it.
7. **Continuing cooperation.** The Applicant will promptly furnish any further information the Commission requires to evaluate this request, including an unredacted in-camera submission of the attachment, and will comply with any conditions the Commission attaches to a grant.

CONCLUSION

For the reasons stated, the Applicant respectfully requests that the Commission withhold from routine public inspection the portions of the Question 7 Description identified in Item 1 of this request, for the period justified in Item 8. The Applicant certifies that the statements made in this request are true and correct to the best of the Applicant's knowledge and belief.

Respectfully submitted,



Matthew Stochelski

Individual Applicant, pro se

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This request is submitted for the public file and contains no confidential information.

REDACTED VERSION — FOR PUBLIC INSPECTION

Exhibit A — Form 442 Question 7: Experimentation Description

(Wideband RF Signal Processing and AI-Synchronized Multi-Sensor Fusion for Experimental Wireless Systems)

ELS File No. 0527-EX-CN-2026 · FRN 0038401642 · Applicant: Matthew Stochelski

NOTICE: This is the redacted public version of the Question 7 Experimentation Description. Material shown in black bars has been withheld from public inspection pursuant to a Request for Confidentiality filed concurrently under 47 C.F.R. §§ 0.457(d) and 0.459. The withheld material consists of trade secrets and confidential commercial information exempt from disclosure under Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4). All frequency, emission, power, antenna, location, interference-mitigation, and term information remains unredacted below.

1. Objectives

This Conventional Experimental Radio License application requests authority to conduct laboratory and controlled-field research on wideband radio-frequency (RF) signal capture, digitization, storage, digital processing, and low-power retransmission techniques.

[REMAINDER OF OBJECTIVES REDACTED — CONFIDENTIAL TREATMENT REQUESTED]

2. Equipment and Theory of Operation

The experimental station consists of two complementary test configurations:

- A compact, hand-carriable portable platform (Pelican-style case) for field-style testing.
- A 10” rackmount homelab station for detailed development and debugging.

Core components include:

- Wideband receive and transmit antennas covering 400 MHz – 6 GHz.
- RF front-end (LNA + bandpass filtering with switchable paths for the authorized bands).

[REMAINDER OF COMPONENT DESCRIPTION REDACTED — CONFIDENTIAL TREATMENT REQUESTED]

[THEORY OF OPERATION REDACTED — CONFIDENTIAL TREATMENT REQUESTED]

[DESCRIPTION OF SENSOR-FUSION SUBSYSTEM REDACTED — CONFIDENTIAL TREATMENT REQUESTED]

3. Frequencies and Emissions

Operations will be limited to the following frequency ranges (all within the bands requested in this filing):

- 433.05 – 434.79 MHz
- 840.5 – 845 MHz
- 902 – 928 MHz
- 2400 – 2483.5 MHz
- 5725 – 5875 MHz

Primary emission: 100M0W7D

Maximum power: ≤ 100 mW ERP (conducted testing at even lower levels is preferred for the majority of development).

4. Interference Mitigation and Operational Constraints

All testing will be conducted on a strict non-interference basis.

- Primary mode of operation: conducted testing using coaxial cables, attenuators, and shielded enclosures to eliminate radiated emissions.
- Any radiated testing will use the minimum practical power, directional or low-gain antennas when possible, and will be performed indoors or in controlled outdoor areas away from populated zones. All testing will be coordinated with federal law enforcement.
- Continuous spectrum monitoring will be maintained. Operations will cease immediately upon any actual or reported interference.
- The station is mobile/base-and-mobile within the 0.5 km radius previously specified.

5. Duration

Initial term requested: 12 months.

6. Expected Outcomes

[EXPECTED OUTCOMES REDACTED IN THEIR ENTIRETY — CONFIDENTIAL TREATMENT REQUESTED]

The anticipated results of the program consist of prototype development outcomes and advances in signal-processing and multi-sensor synchronization methods. The specific objectives and intended applications are the subject of a pending United States patent application held in confidence under 35 U.S.C. § 122(a), and are withheld on that basis and as trade secret material.

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