

STA File Number: 0338-EX-PL-2013

Subject: Request for Confidentiality

In accordance with Sections 0.457(d) and 0.459 of the Commission's Rules, 47 CFR §§ 0.457(d) and 47 CFR §§ 0.459, the Freedom of Information Act, 5 U.S.C. § 552, and the Trade Secrets Act, 18 USC § 1905, Millennium Space Systems requests that the information submitted in this application be considered confidential and therefore not be placed in the public file and otherwise be withheld from public inspection for the following reasons:

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

The following exhibits are being requested to remain confidential:

Exhibit 1 - Millennium Space Systems SPace-based High-resolution Imagery Network eXperience (SPHINX) Concept of Operations and Radio Frequency Overview

Exhibit 2 - Millennium Space Systems SPace-based High-resolution Imagery Network eXperience (SPHINX) Orbital Debris Assessment Report (ODAR)

Exhibit 3 - Millennium Space System SPace-based High-resolution Imagery Network eXperience (SPHINX) Response to Questions (Reference Number 20702)

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

The Exhibits being submitted with this application (0338-EX-ST-2013) are in conjunction with Millennium Space Systems effort to develop the SPHINX satellite bus, a mobile satellite system platform that delivers an innovative low cost package that allows for quick production of satellites with expected on-orbit agility in conjunction with advanced payloads to produce quality data streams to a variety of commercial applications.

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

The following Exhibit provides specific sensitive proprietary technical information relating to Millennium Space Systems SPHINX satellite bus, including but not limited to details regarding mission design methodology, engineering analysis, and operations methodology.

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

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As this is still an ongoing program, Millennium Space Systems is in competition with other entities which public disclosure of the material within the application could allow Millennium Space Systems competitors easy access to sensitive and proprietary company information, which under normal business circumstances is not and would not be publicly disclosed.

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

Disclosure of this information, including but not limited to details regarding mission design methodology, engineering analysis, and operations methodology, could put competitors of Millennium Space Systems at an unfair advantage causing damaging financial consequences to Millennium Space Systems.

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

Currently, Millennium Space Systems has taken all reasonable precautionary steps to ensure all sensitive and proprietary technical information relating to Millennium Space Systems SPHINX satellite bus is out of the public domain by marking all documents Proprietary and Confidential. This is vital to ensure that there is not an unfair competitive edge obtained by Millennium Space Systems' competitors and there is no current intention to release any information to the public domain.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties;

To the best of Millennium Space Systems knowledge, there is currently no information released to the public regarding the SPHINX satellite bus. There is no current intention to release any information to the public domain and any info that is passed to potential customers is given under previously signed non-disclosure agreements.

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

Millennium Space Systems respectfully requests confidentiality with regards to this application for an indefinite period of time, or up to the maximum period of time allowed by the Commission. As this is a commercial venture, Millennium Space Systems has a right to keep its propriety and sensitive trade secrets out of the public domain where completion could obtain a significant competitive advantage over Millennium Space Systems.

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

It should also be noted that the SPHINX satellite bus program is under International Traffic in Arms Regulations (ITAR), and the inclusion of the information set forth in this application if in the public domain would be readily accessible by foreign persons/entities. Accordingly, Millennium Space Systems requests that this application and all associated exhibits be held out of the public domain to ensure compliance with ITAR.

For the reasons stated in this memo, Millennium Space Systems respectfully requests confidentiality with regards to this application for an indefinite period of time, or up to the maximum period of time allowed by the Commission.

Respectfully,



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