

February 3, 2018

Rashmi Doshi
Chief, Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Nokia of America

Address:
6000 Connection Dr
Irving, TX 75039

RE: Request for Confidential Treatment - Experimental
License Service Application, File Number 0097-EX-CN-
2018

Dear Chief Doshi,

Nokia of America Corp ("Nokia") submits this request for confidential treatment under Commission Rule Sections 0.457 and 0.459 (47 C.F.R. §§ 0.457, 0.459).

The rationale for this request is that Nokia is making considerable investment in the development of the novel wireless communications system that is the subject of the experimental license application. Disclosure of the confidential portions of the license application to competitors could cause Nokia to lose a competitive edge in the market and provide its competitors with an undue advantage in developing similar technologies.

Accordingly, Nokia provides the following responses as directed by Section 0.459(b) of the Commission's Rules:

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

Nokia seeks confidential treatment for the information released in the "Question 7: Experimentation Description/Purpose of Experiment" and "Antenna Registration, especially the directional antenna data" sections of the application.

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

In the referenced application for an experimental license, Nokia seeks to conduct field testing and evaluation of a novel communication technology that it is developing.

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

This technology contains intellectual property owned by Nokia and is being developed towards the goal of producing a commercial product.

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

There are a number of companies developing, or that will develop, similar or competing technology.

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

Disclosure of information about the system, including the operating band, would provide Nokia's competitors an undue advantage in developing similar products.

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

Nokia is not disclosing information to the public.

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

Information is not available to the public. Any disclosure of the information to third parties is subject to executed Non Disclosure Agreements.

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

Nokia request confidential treatment of the material at least for the duration of the experimental license terms. The technology development is part of an ongoing effort to develop a novel wireless communication system. Disclosure of information pertaining to the system during this stage would give Nokia's competitors an advantage in developing similar products and potentially bringing them to the market before Nokia.

(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 is of utmost importance to Nokia that it maintains control over the public release of details regarding its prototype system at trade shows, symposiums, conferences, etc. and be able to manage the risks of early disclosures.

Nokia appreciates your attention to this matter. If you have questions or need further information, please contact the undersigned.

Yours sincerely,

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