

VERNER · LIIPFERT
BERNHARD · MCPHERSON & HAND
CHARTERED

901 - 15TH STREET, N.W.
WASHINGTON, D.C. 20005-2301
(202) 371-6000
FAX: (202) 371-6279

John M. R. Kneuer
(202) 371-6332

January 10, 2001

HAND DELIVERY

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
Experimental Radio Services
P.O. Box 358320
Pittsburgh, PA 15251-5320

Re: FCC Form 442 Application of Northrop Grumman Corporation
for a New Experimental Radio Service Authorization and a
Request for Confidential Treatment of the Application.

Dear Ms. Secretary:

On behalf of Northrop Grumman Corporation ("Northrop Grumman"), there is submitted herewith, on FCC Form 442, an application for a new experimental radio service authorization. In addition, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ Northrop Grumman **hereby requests confidential treatment** of certain privileged and confidential commercial information contained in the attached Experimental Radio Service Application and herewith submitted in a sealed envelope marked "Confidential."

In accordance with the requirements of Section 0.459(b),² Northrop Grumman submits the following:³

¹ 47 C.F.R. §§ 0.457, 0.459; see also *Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission*, GC Docket No. 96-55, *Report and Order*, (FCC 98-184)(rel. Aug. 4, 1998)("Confidentiality Report and Order").

² 47 C.F.R. § 0.459(b).

³ Pursuant to the *Confidentiality Report and Order*, Northrop Grumman submits its response to only those criteria of Section 0.459(b) that are relevant to the information for which confidential treatment is sought. See *Confidentiality Report and Order* at ¶ 13.

1. Specific Information for Which Confidential Information is Sought

Northrop Grumman requests that Exhibit 3 to the attached FCC Form 442, which has been marked "Confidential" be treated as such, and not made available to the public.

2. Proceeding in Which the Information is Being Submitted and a Description of the Circumstances of its Submission

This information is being submitted as part of an Experimental Radio Service Application and in response to question 8 of FCC Form 442.

3. Degree to Which the Information is Commercial or Financial, or Contains a Trade Secret or is Privileged

The information included in Exhibit 3 is expressly privileged and confidential pursuant to the contract under which the experimental radio program is being performed. In accordance with this contract both parties have agreed to keep confidential to the extent possible all information related to the program. Public disclosure of the information contained in Exhibit 3 would violate the terms of this contract and cause Northrop Grumman competitive harm by damaging Northrop Grumman's existing customer relationship and Northrop Grumman's ability to enter into confidential relationships in the future.

4. Measures Taken by Submitting Party to Prevent Unauthorized Disclosure

Northrop Grumman has comprehensive internal procedures for the protection of privileged, confidential and classified information. Northrop Grumman routinely executes contracts with the United States government that entail the protection of classified information. The information contained in Exhibit 3 has been subject to procedures similar to those employed by Northrop Grumman in the protection of classified information.

5. Whether Information is Available to the Public and the Extent of any Previous Disclosure of the Information to Third Parties

The information contained in Exhibit 3 is not available to the public and has not been made available to third parties.

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6. Justification of the Period During Which the Material Should not be Made Available to the Public

The information contained in Exhibit 3 should be withheld from public disclosure indefinitely. Under the terms of Northrop Grumman's contract with its customer, information related to this contract shall remain confidential after the performance of the contract.

If you any questions regarding this application or request for confidential treatment, please do not hesitate to contact the undersigned at your convenience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John M. R. Kneuer", with a long horizontal flourish extending to the right.

John M. R. Kneuer
Attorney for Northrop Grumman Corporation

Enclosures

cc: Carl Huie
Steve Balaz