

REQUEST FOR CONFIDENTIAL TREATMENT

September 10, 2026

VIA ELS

Andrew Hendrickson
Chief, Office of Engineering and Technology
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Request for Confidential Treatment; ELS File No. 1817-EX-ST-2026

Dear Mr. Hendrickson:

Pursuant to 47 C.F.R. §§ 0.457 and 0.459, Northwood Space, Corp. (“Northwood”) hereby seeks confidential treatment of the above above-referenced experimental licensing application.

This application contains information that is commercially and competitively sensitive, and certain portions may also relate to national security considerations (collectively the “Confidential Information”). In the ordinary course of business, Northwood does not disclose this information to the public, competing organizations, or other third parties. Accordingly, Northwood respectfully requests that the Commission grant confidential treatment and refrain from making any portion of Northwood’s application available for public inspection, consistent with the Commission’s rules governing public access to records and information pursuant to the Freedom of Information Act (“FOIA”).¹

Exemption 4 of FOIA authorizes federal agencies to withhold from public release trade secrets as well as commercial or financial information obtained from a person when such information is privileged or confidential.² Section 154(j) of the Communications Act authorizes the FCC to restrict public access to records containing information related to national security.³ Under Sections 0.457(d) and 0.459 of the Commission’s rules, parties submitting materials may request that such materials be withheld from public inspection. Consistent with this request, Northwood submits as follows:

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

Northwood requests confidential treatment for the experimental authorization application submitted with this letter, including all accompanying attachments except for the present

¹ 5 U.S.C. § 552.

² *Id.* § 552(b)(4).

³ 47 U.S.C. § 154(j).

confidentiality request (the “Confidential Information”). The filing contains highly sensitive information that is not publicly available and, if disclosed, could reveal proprietary details. Accordingly, Northwood requests, pursuant to Section 0.459 of the Commission’s rules, that the information be withheld from public inspection.

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

The information is submitted as part of Experimental License System File No. 1817-EX-ST-2026.

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

The application, including exhibits other than this request for confidentiality, contains proprietary trade secrets and commercially, competitively, and financially sensitive information concerning Northwood’s products, services, and operations. As such, it falls within the scope of information protected from public disclosure under Exemption 4. It also includes information related to sensitive governmental priorities of the United States. Information about Northwood’s requested authority under this application could have national security implications if made public. This information, therefore, is also protected from disclosure under Section 154(j) of the Communications Act.⁴

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

Northwood operates in a highly competitive aerospace and defense market with numerous industry participants.

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

The confidential information includes proprietary, non-public details regarding Northwood’s technology, capabilities, and mission planning. Disclosure of this information could provide competitors with insight into Northwood’s operations and strategic initiatives, thereby placing Northwood at a competitive disadvantage. This information is not ordinarily available to the public.

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

Northwood consistently treats the confidential information contained in its application as proprietary and highly sensitive. Access to this information is limited to individuals whose responsibilities require knowledge of the subject matter.

⁴ *Id.* (permitting the FCC to withhold confidential information “affecting the national defense”).

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

Northwood has not disclosed the confidential information to the public and has only shared it with third parties pursuant to protective measures. Northwood voluntarily provides the information to the Commission at this time with the expectation that it will be treated confidentially in accordance with the Commission's rules.⁵

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

Because of the proprietary and non-public nature of the Confidential Information, Northwood does not anticipate a time when the information will cease to require confidential treatment. Accordingly, Northwood respectfully requests that the Commission maintain such protection indefinitely.

(9) Other information that Northwood believes may be useful in assessing whether its request for confidentiality should be granted.

FOIA Exemption 4 protects information from public disclosure when it constitutes trade secret, commercial, or financial information obtained from a non-governmental source and is privileged or confidential in nature. The Confidential Information readily satisfies these criteria because it consists of proprietary, commercial sensitive, and non-public information provided by Northwood. Additionally, both the FOIA exemptions and the Communications Act expressly allow the FCC to protect national security information from disclosure. In light of these considerations, Northwood respectfully requests that the Commission grant confidential treatment to the Confidential Information and refrain from making it available for public inspection.

Consistent with 47 C.F.R. § 0.459(d)(1), Northwood requests notification if release of the information subject to this request is requested pursuant to the FOIA or otherwise, so that it may have an opportunity to oppose grant of any such request.

Sincerely,

/s/ Kyle Wesson

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⁵ See *Critical Mass Energy Project v. Nuclear Regulatory Comm'n*, 975 F.2d 871, 879 (D.C. Cir. 1992).