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September 18, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Request for Non-Disclosure/Confidentiality

Application for Experimental License Submitted by Ossia, Inc.; ELS File No. 0706-EX-CN-2019

Dear Ms. Dortch:

Ossia, Inc. hereby requests confidential treatment of its Confidential Exhibit to its application submitted on September 18, 2019, under Experimental Licensing System ("ELS") File No. 0706-EX-Ossia-2019 (the "Application"), a copy of which is enclosed and marked for confidentiality in the application. This confidential Exhibit includes an item of information relative to the experimental operations to be conducted. The Application is being voluntarily provided today to the Federal Communications Commission ("FCC") to seek experimental authority for Ossia to evaluate the company's Cota wireless power transfer ("WPT") system actively powering electronic shelf labels ("ESLs") in real-world conditions at a customer location.

This request is being made pursuant to Section 0.459 of the FCC's Rules, 47 C.F.R. § 0.459 (2018), and in accordance with Section 552(b)(4) of the Freedom of Information Act, 5 U.S.C. § 552(b)(4), and Sections 0.457(d)(2) and 0.459(b) of the FCC's Rules, 47 C.F.R. §§ 0.457(d)(2), 0.459(b) (2018). Section 552(b)(4) of the Freedom of Information Act permits an agency to withhold from public disclosure any information that qualifies as "commercial or financial information obtained from a person and privileged or confidential." 5 U.S.C. § 552(b)(4). The following information is provided pursuant to Section 0.459(b) to demonstrate that the confidential information submitted herein should not be disclosed.

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

Ossia requests confidential treatment of the street address information related to one of two test sites in the Application and Narrative, in particular the identity and address of the customer location where experimentation will be conducted.

The Application and the Narrative contain highly confidential business information regarding Ossia's business customer and its activities. Public release of such confidential commercial and operational information could irreparably harm Ossia, its testing partner, and the relationship

between the two, as it would be made available to the company's competitors, giving those competitors an unfair advantage over Ossia. See 47 C.F.R. § 0.457(d).

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

The Application and subject Experimental Exhibit were filed in connection with a request for experimental license submitted by Ossia, Inc., on September 18, 2019, under ELS File No. 0706-EX-CN-2019.

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged. The Confidential Exhibit includes proprietary operational and commercial business information protected by Section 0.457(d). Specifically, the Confidential Exhibit includes proprietary details relating to the testing partner/customer's location, which would identify the testing partner/customer with which the testing is being performed.

(4) Explanation of the degree to which the information concerns a service that is subject to competition. The confidential information in the Confidential Exhibit relates to the identity of the customer/testing partner for one of the testing locations.

(5) Explanation of how disclosure of the information could result in substantial harm. Disclosure of the confidential customer information would result in substantial competitive harm and potentially other harm to Ossia and its customer. As noted above, the information includes proprietary details regarding Ossia's research and development activities at a customer's location. This information would be of value to other companies in the equipment development and manufacturing business. Competitors and others would be able to use this information to gain insight into Ossia's operations as well as Ossia's internal business practices.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure. Ossia does not release to the public in the normal course of business the proprietary commercial business information at issue here to the level of detail provided in the Confidential Exhibit.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties. Although the information in the Confidential Exhibit could be speculated on, and possibly derived by knowledgeable experts from, other materials in the public domain, Ossia has not and does not intend to make the confidential information with respect to its experimental operations at issue here available to the public to the same level of detail submitted herein. In the event that the confidential

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information is provided to third parties, such as other customers and investors, it is done so via arrangements that maintain confidentiality.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure. Ossia requests that the material for which it requests confidentiality be protected indefinitely. At no time during the experiment would Ossia, in the normal course of business, provide this information to the public, unless it becomes widely disseminated by others.

(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted. Public release of the proprietary commercial business information submitted herein would harm Ossia's position in the highly competitive equipment manufacturing industry. Impairment of Ossia's business position by the improvident release of confidential business information would undercut its business and business position.

For the foregoing reasons, Ossia requests that the unredacted portions of the Application and Narrative be treated as confidential and be withheld from public inspection.

Respectfully submitted,

/s/

Bruce A. Romano
FCC Counsel for Ossia, Inc.

cc (via email):