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**REDACTED VERSION**

**September 4, 2013**

Chief Julius Knapp  
Experimental Licensing Branch  
Office of Engineering and Technology  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Room 7-A322  
Washington, D.C. 20554

Re: Application for Experimental License  
File No. 0600-EX-PL-2013  
**Request for Confidential Treatment**

Dear Chief Knapp:

Pursuant to Sections 0.457 and 0.459 of the Commission's rules, Parallel Wireless, Inc. respectfully requests confidential treatment in connection with the above-referenced Application for Experimental License ("Application").

Parallel Wireless provides the following information pursuant to 47 C.F.R. § 0.459(b) of the Commission's rules.

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

Parallel Wireless requests that the following information, which is part of Exhibit 1 of the application, be treated as confidential. Parallel Wireless does not seek to withhold from public inspection Form 442 information necessary for interference mitigation including applicant name, contact information, location, frequency, and power.

**[REDACTED]**

*(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 was submitted in connection with Parallel Wireless' Application for Experimental License, File No. 0600-EX-PL-2013, filed September 4, 2013.

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

Our proprietary base station design is a trade secret. [REDACTED]

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

The information for which confidential treatment is sought concerns the highly competitive field of wireless data communication. This information regarding Parallel Wireless' private business and operations "would customarily be guarded from competitors." See 47 C.F.R. §§ 0.459(a)(4), 0.457(d)(2).

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

Disclosure of the information would reveal confidential trade secrets, technical information, and business information resulting in disruption to Parallel Wireless' vendor relationships, and plans to build a start-up company in the highly competitive wireless data communications market.

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

Please see response to item (7) below.

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

Parallel Wireless has not made the information subject to this request available to the public or to third parties absent a non-disclosure agreement. Parallel Wireless does not routinely disclose commercially sensitive information to the public or to third parties. In addition, Parallel Wireless has established internal procedures to safeguard such information. Parallel Wireless voluntarily provides the information at this time with the expectation that it will be treated confidentially in accordance with the Commission's rules. See *Critical Mass Energy Project v. Nuclear Regulatory Comm'n*, 975 F.2d 871, 879 (D.C. Cir. 1992)(commercial information provided on a voluntary basis "is 'confidential' for the purpose of Exemption 4 if it is of a kind that would customarily not be released to the public by the person from whom it was obtained.").

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

Parallel Wireless requests that the information be held confidentially during the period for which experimental authority is requested, and thereafter until such information is no longer deemed confidential and proprietary to Parallel Wireless and no longer subject to Parallel Wireless' procedures for maintaining its confidentiality.

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

The information for which confidential treatment is requested falls within Exemption 4 of the Freedom of Information Act ("FOIA"), which provides a statutory basis for withholding from public inspection "matters that are trade secrets and commercial or financial information obtained from a person and privileged or confidential." 5 U.S.C. § 522(b)(4).

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

Respectfully submitted,

/s Anne-Marie Dinius  
Counsel for Parallel Wireless, Inc.