

### **Statement Justifying Confidential Treatment of the Experiment Description.**

Planet Labs Inc. is submitting an application for the authorization of an experimental radio system. The description materials reveal information to competitors of possible future capabilities which are competitive in the market. Therefore we request confidential treatment of the Experiment Description attachment to the application, and pursuant to Commission rules §0.459(a)&(b), we respectfully submit this statement justifying our request for confidential treatment.

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

The Experiment Description narrative attachment which reveals details of the technology in a way directly implicating possible future capabilities to competitors.

(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 provided in a written document and to be submitted as an attachment to an Experimental STA application to the OET.

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

The future potential capabilities of Planet are regarded as confidential until such time Planet releases the capabilities to customers.

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

There are several competitor companies pursuing plans for similar services to commercial and government customers.

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

With early knowledge of Planets endeavors, competitors have more time to respond with similar efforts to meet the same market requirements for services.

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

All employees at Planet have NDA's and instructions for the protection and confidentiality of its internal activities and development projects.

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

There have been no other public disclosures of the experimental technology being used or the intentions of Planet for the technology.

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

The requested confidentiality period is permanent until which time Planet makes a decision to reveal any new product or service offerings.

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

No other information.

February 4, 2019