

Raytheon Missile Systems Experimental License Modification Application
Request for Confidentiality
Application File Number: 0120-EX-ML-2016

Raytheon Missile Systems is requesting confidentiality for experimental license application number 0120-EX-ML-2016 to the extent allowed by the Commission's Rules, 47 C.F.R. §0.459. Should the Commission be unable to grant this confidentiality request, the applicant requests that the Commission contact the applicant as soon as possible.

The radio operations proposed under this application are for the testing of proprietary technology under research and development to serve some interests expressed by federal agencies in the US. While the Commission's Rules automatically protect some national security information from public disclosure under 47 C.F.R. §0.457, the application submitted here does not fit into the specific provisions of Section 0.457. Therefore, Raytheon Missile Systems is seeking to protect the information submitted here under the provisions of Section 0.459 of the Commission's Rules. The request for confidentiality is intended to protect proprietary and sensitive information about how this technology is being developed and how it might operate. Protecting this information will protect Raytheon's proprietary technology from unwarranted exposure.

Additionally, this application includes technical trade secret information which Raytheon wishes to keep secret from its competitors, in addition to shielding the sensitive information from general release. The details in the exhibit include information that could lead competitors to learn about some of Raytheon's proprietary innovations in factory development using spectrum. Keeping the design and operation of this facility confidential is essential to maintaining the totality of the trade secrets related to Raytheon's factory innovations and how they work.

This request for confidentiality requests that the Commission withhold from public view any information related to the description of use of spectrum and all exhibits filed with this application. Protection of this information is essential to preserve Raytheon Missile Systems ability to fulfill its responsibilities to its Department of Defense customers and to protect the American public.

In accordance with the OET Electronic filing system requirements, a point by point explanation of the request under section 0.459 of the Commission's Rules is set forth below. Raytheon Missile Systems hereby requests confidential treatment of this application and, in particular, confidential treatment of the exhibits.

Subsection (b) (1): information to be kept confidential – all information in the exhibit to application and as much of the application as can be kept confidential;
Subsection (b) (2): This application is submitted as required by law to seek authorization to operate, however the circumstances of the operation require that

this confidentiality request be filed in the interests of national security and to protect trade secrets. This explanation is provided more fully above.

Subsection (b) (3): Some aspects of the system under development are protected trade secrets, and as such, confidential treatment of this application will protect from the public some of the tools and techniques that Raytheon keeps secret to advance the development of its products.

Subsection (b)(4): N/A

Subsection (b)(5): N/A

Subsection (b)(6): Only this submission with the accompanying confidentiality request has been made public, the rest of the information is at a secured facility and held as company proprietary trade secrets;

Subsection (b)(7): The underlying information is available only to individuals with the authority to access the information at the relevant secured facilities.

Subsection (b)(8): National security requires that this information be kept confidential during processing AND for the duration of any license, and license renewal, that is issued.

Subsection (b) (9): N/A

Please contact Anne Cortez with any questions, 520-360-0925 or alc@conspecinternational.com.