

**RIVA Networks Inc. – Response to Correspondence Reference 38511,
Dated 8/21/17**

To: FCC

Date: August 22 2017

The following is RIVA Networks response to Correspondence Reference 38511, dated 8/21/17. The sections highlighted in red are from FCC correspondence. The sections highlighted in blue are RIVA Networks responses.

- 1. You have selected the content of your experiment to be kept confidential, please submit a confidentiality request in accordance with the rules in CFR 47, Part 0.459(b) that lists nine items. Please attach your response in Q and A format, and list those attachments need to be withheld from general public viewing in response to item number one. The intended confidentiality request letter cannot be kept confidential; therefore, please do not include any confidential material in this letter.**

§ 0.459 Requests that materials or information submitted to the Commission be withheld from public inspection.

(b) Except as provided in § 0.459(a)(3), each such request shall contain a statement of the reasons for withholding the materials from inspection (see § 0.457) and of the facts upon which those records are based, including:

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

RIVA Networks seeks to protect as confidential the hardware, software, methods and technology developed by RIVA for the purpose of optimizing small cell infrastructure(s) and performance.

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

The emerging small cell industry products and services vary wildly among the vendors. RIVA seeks to identify best of breed solution to create a product definition the lead to uniformity in the new small cell industry.

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

RIVA is a privately held small business; competing with Fortune 500 companies. RIVA seeks to commercial and financial confidentiality in order to compete with more powerful Enterprises.

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

The results of the small cell testing and evaluation will enable RIVA to build a complete small cell platform that will be offered as a service to commercial cell carriers.

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

As a small business, RIVA's competitive advantage is time to market. RIVA's rapid product development cycle requires confidentiality during the research and development period in order to prevent large commercial carriers, with greater resources, from preventing RIVA from entering the market with their completed solution.

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

RIVA maintains strict non-disclosure contracts with all employees, consultants and vendors.

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

RIVA will withhold any public disclosures of their test and evaluation efforts until the platform and commercial offering is complete.

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

RIVA requests the confidentiality extend until the final commercial platform is defined, built and offered to commercial carriers.

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

RIVA Networks is engaging in a study to accelerate the adoption of small cell technologies across a range of markets. This study will take into consideration all aspects of small-cell deployment including technical, marketing and economic aspects. We will use case studies to take into consideration a diverse range of markets including rural communities, remote industrial areas, public safety, disaster recovery, transportation, military and special events.

The basic configuration of the equipment utilized for this study will consist of a PCS licensed transmitter transceiver and small single board computer which contains the MSC/BSC/GGSN housed in a man portable "black-box fly-away case". The PCS licensed transmitter for this study is an ipAccess model 165H (or equivalent) which has an FCC Equipment ID QGGKU02ZZR.

The basic concept of operation will focus around the ease of deployment and operation of a stand-alone small-cell network. The "black-box" test system will have a single button to activate the system and will be manageable through a tablet operating over WiFi. Mobile handsets will be included with the test system to demonstrate real-world use and operation. The system will demonstrate the capability to make calls and send texts between mobile phones attached to the network as well as perform web browsing and sending of email via a small portable satellite (i.e. BGAN or Iridium) terminal. The system will have the ability

to scan for existing cellular networks and autonomously determine available channels (ARFCN) to prevent interference.

The specific objectives of this study will be to analyze the challenges, best practices, and potential solutions from a variety of angles and use cases. This analysis will cover every conceivable aspect including:

Business drivers - How will small-cell devices leverage existing operator investment in devices and infrastructure? How will it aid underserved areas and communities? What are the benefits of low-cost COTS equipment historically served with large systems with long deployment/development life cycles?

Market perception - How will small-cell devices be perceived by the general public as well as specialized users such as public-safety workers?

Regulatory issues - what impact will small-cell devices have across the US? What are the implications on frequency management, spectrum licensing and lawful intercept? How will their use aid emergency responders?

Technical issues - What are the backhaul requirements to support a variety of markets and deployment uses cases? What kind of network architectures and virtualization technologies can be used to optimize cost and performance? How will these small-cell systems be deployed to support interoperability? What kinds of services will be required to support and maintain these kinds of networks?

2. Please explain your request for a nationwide experimental license.

The overall goal of the study will be to establish uses cases that illustrate the broad range of applications through which small-cells can deliver high value mobile voice and data services to communities and businesses. By leveraging their size, portability and ease of deployment into a very cost effective solution to serve poorly or underserved areas. The target communities, businesses and underserved areas we wish to server are located throughout the country.