

20 November 2014

Attachment to FCC File No. 0777-EX-PL-2014

**Letter requesting Long-Term Confidentiality in accordance with
the rules in CFR 47, Parts 0.457(d) and 0.459(b)**

William R. Beason

Scientific Research Corporation
2300 Windy Ridge Parkway
Suite 400 South
Atlanta, GA 30339
770-859-9161 x571
bbeason@scires.com

Background

Scientific Research Corporation (SRC) operates under a wide collection of contracts with the United States Government, with the DoD, Navy and Air Force being the primary customers. Typical deliverables to the government are For Official Use Only (FOUO) or classified. SRC also conducts Independent Research and Development (IR&D) efforts to support government areas of interest in anticipation that the work will eventually support work under direct contract to the government.

Scientific Research Corporation is under contract with the U.S. Government to develop and test a new modulation type that is targeted towards operations in the HF spectrum.

Exhibits Covered by Confidentiality Request

- Attachment – Government Project Description (Form 442, Question 4)

Reasons for Confidentiality Request

No portion of CFR 47 0.457(d) applies to this request for confidentiality.

In accordance with CFR 47 0.459(b), we request confidentiality in accordance with the nine points specified:

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

Long-term confidentiality is required, to the extent permitted by law, for:

- Attachment, "Government Project Description (Form 442, Question 4)"
 - Times at which transmissions will occur
 - Identities of the direct and indirect government customers being served
 - Contract number
 - Period of performance

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

Not applicable. This activity is unrelated to any Commission Proceeding.

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

Some of the information related to the FCC Part 5 license request may be developed into intellectual property (IP) rights of SRC. Under terms of its government contracts, SRC typically retains rights to this IP, and the rights to protect it from further dissemination, while the government retains the right to use this IP on a royalty-free basis. However, the primary concern for long-term confidentiality herein is to prevent compromising the security of systems whose operational characteristics might be modified and/or determined based on the results of the tests conducted under this Part 5 license. All program information related to this license request is governed by the government's Security Classification Guide. The SCG defines all program information to be at a minimum FOUO and not subject to release under FOIA.

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

SRC has Small Business Innovative Research (SBIR) rights for restricted dissemination of information regarding the technology being tested.

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

While the possibility exists that there may be competitive harm, the primary concern here is protection of information for security reasons. SRC's US Government customer has requested that there not be open association of their organization with this experimental license request. However, competitive harm could occur, for example, if technical details from the Part 5 license request would lead a potential vendor to conclude that the government offeror for a procurement had a preferred solution in mind when choosing to whom to award a contract.

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

The submitting party (SRC) treats information such as that referred to herein as a minimum of "For Official Use Only (FOUO)" in accordance with its government contracts. No program information is openly published.

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

The information contained herein is not available to the public, and has not been disclosed publically.

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

Until specifically approved for public release, material categorized as FOUO by SRC with respect to its government-sponsored work is not subject to automatic release by SRC at some time in the future.

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

As stated, the requirements for long-term confidentiality are based on the possible applicability of the tests and results to government activities that must be protected from public disclosure for reasons of security.

Thank you for your consideration of this request,

A handwritten signature in black ink, appearing to read "Bill Beason", with a long, sweeping horizontal line extending to the right.

Bill Beason

11-20-14

Date