

May 10, 2019

VIA OET EXPERIMENTAL LICENSING SYSTEM

Office of Engineering Technology
Federal Communications Commission
441 12th Street, SW
Washington, DC 20006

Re: Sony Corporation R&D Center
Application for Special Temporary Authority
File Number 0870-EX-ST-2019
Request for Confidential Treatment

To whom it may concern:

Pursuant to Sections 0.457 and 0.459 of the Commission's rules, Sony Corporation R&D Center ("Sony") respectfully requests confidential treatment for portions of its Application for Special Temporary Authority ("STA"), to which this letter is submitted as an exhibit, as more fully described below.

As required by Section 0.459(b) of the Commission's rules, Sony submits the following statement of the reasons for withholding the materials from public inspection:

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

Sony requests confidential treatment, to the extent permissible, for the information in the document titled "Exhibit," which was submitted to this file on May 10, 2019.

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

Sony is submitting this information in connection with its participation in GN Docket No. 15-319. Sony has requested an STA in order to conduct an Initial Commercial Deployment ("ICD") of its Spectrum Access Service ("SAS"). Sony has received a conditional authorization from the Commission to serve as a SAS Administrator for wireless operations in the 3550-3700 MHz band, and an ICD is required before the Commission will issue a final authorization.

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

This exhibit includes commercial information and trade secrets regarding the implementation details of Sony's ICD proposal.

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

Sony is one of five entities that have received conditional authorization to serve as a SAS administrator and are currently in the process of conducting lab testing in preparation for ICD. Upon receiving final authorization, these SAS administrators will compete to provide service for wireless operations in the 3.5 GHz band.

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

Disclosure of this confidential material could result in substantial competitive harm because it includes commercial information and trade secrets regarding the implementation details of Sony's ICD proposal, and public disclosure would undermine Sony's ability to offer a competitive SAS.

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

Sony uses all commercially reasonable methods to prevent unauthorized disclosure of confidential material, and has submitted redacted versions of its filings in GN Docket No. 15-319, with corresponding requests for confidential treatment.

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

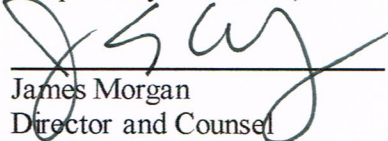
Except for the confidential submission of its ICD proposal to Commission staff on April 12, 2019, this information has not previously been shared outside of Sony, including to the public or to third parties.

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

Sony asks that this information remain confidential until its ICD proposal has been approved and implemented, at which point any potential for competitive harm will no longer exist.

Please contact the undersigned with any questions about this request.

Respectfully submitted,



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