

Exhibit 1

Request for Confidential Treatment

United Wireless Communications, Inc. (“United Wireless”), pursuant to 5 U.S.C. § 552 and Sections 0.457 and 0.459 of the Commission’s Rules,¹ hereby requests that certain information complementary to its application for an Experimental Radio Service License (File No. 0761-EX-CN-2017) (“Experimental License Application”) be treated as confidential and not subject to public inspection. The designated information constitutes confidential and proprietary information that, if subject to public disclosure, would cause significant commercial, economic, and competitive harm. As described below, United Wireless’ request for confidential treatment satisfies the standards for grant of such requests set forth in Sections 0.457 and 0.459 of the Commission’s Rules.

In accordance with Section 0.459(b) of the Commission’s Rules, and in support of this request, United Wireless provides the following information:

1. Identification of Information for Which Confidential Treatment is Sought:

United Wireless’ request for confidential treatment is limited to the information that has been redacted from the Narrative Statement (Exhibit 1) to its Experimental License Application. United Wireless does not seek to withhold from public inspection information in the Narrative Statement necessary for interference mitigation, including, but not limited to, information regarding: applicant name, contact information, test location, frequency, output power, effective radiated power, emission characteristics, and modulation. Accordingly, a redacted version of the Narrative Statement is provided in Exhibit 3 of the Experimental License Application.

2. Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission:

The confidential portions of the Narrative Statement were submitted to the Commission in support of United Wireless’ Experimental License Application.

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged:

The information requested to be kept confidential has significant commercial value. The exhibits supporting the Experimental License Application discuss tests and experiments that include trade secret information. The Commission has clarified that confidential treatment should be afforded to trade secrets. United Wireless’ tests, experiments, and proprietary wireless

¹ 47 C.F.R. §§ 0.457, 0.459.

applications using particular radio frequency equipment represent a “secret commercially valuable plan” within the meaning of a trade secret as recognized by the Commission.

4. Explanation of the degree to which the information concerns a service that is competitive:

The services and technologies that are subject of this Experimental License Application have not yet been fully developed but are expected to lead to material developments in markets subject to competition from multiple U.S. and non-US. third parties.

5. Explanation of how disclosure of the information could result in substantial competitive harm:

The technology under development is highly sensitive and confidential in nature. The release of such information would provide valuable insight into United Wireless’ technological innovations and potential business plans and strategies. Public disclosure would jeopardize the value of the technology under examination by enabling others to utilize United Wireless’ information to develop similar products in a similar or expedited timeframe.

6. Identification of any measures taken by the requesting party to prevent unauthorized disclosure:

United Wireless has taken steps to keep confidential the information set forth in the confidential exhibits by limiting the number of people involved in the tests and experiments to only those on a “need to know” basis.

7. Identification of whether the information is available to the public and the extent of any previous disclosures of the information to any third parties:

The confidential portions of the Narrative Statement are not available to the public, and have only been disclosed to limited third parties involved in the preparation of the Experimental License Application. United Wireless voluntarily provides this information to the Commission at this time with the expectation that it will be treated confidentially in accordance with the Commission’s Rules.²

² See *Critical Mass Energy Project v. Nuclear Regulatory Comm’n*, 975 F.2d 871, 879 (D.C. Cir. 1992) (commercial information provided on a voluntary basis “is ‘confidential’ for the purpose of Freedom of Information Act (FOIA) Exemption 4 if it is of a kind that would customarily not be released to the public by the person from whom it was obtained”).

8. Justification of the requested period of confidentiality:

United Wireless expects that confidential treatment will be necessary for the length of the proposed experiment and thereafter in order to protect its evolving business and technology strategies.

9. Any other information that would be useful in assessing whether this request should be submitted:

The information subject to this request for confidentiality should not be made available for public disclosure at any time. There is nothing material that public review of this information would add to the Commission's analysis of United Wireless' Experimental License Application.

Moreover, public disclosure of the sensitive information in the confidential exhibits to the Experimental License Application after the Commission has ruled on this request for confidential treatment is not necessary for the Commission to fulfill its regulatory responsibilities.

Consistent with Section 0.459(d)(1) of the Commission's Rules, United Wireless requests notification if release of the information subject to this request for confidential treatment is requested pursuant to the FOIA or otherwise, so that United Wireless may have an opportunity to oppose grant of any such request.