

July 20, 2026

Experimental Radio Branch
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: Varda Space Industries, Inc. File 1427-EX-ST-2026
Request for Confidential Treatment Under the FCC's Rules

To Whom It May Concern:

In connection with Application File Number 1427-EX-ST-2026 (the "Application"), on behalf of Varda Space Industries, Inc., a Delaware corporation ("Varda" or the "Company"), we hereby submit this request for confidential treatment for the following exhibits (the "Confidential Exhibits") to the Application:

Varda WSERIES11 Technical Narrative
Varda WSERIES11 ODAR

The Confidential Exhibits contain confidential Varda trade secrets and/or commercial or financial information within the definition of 5 U.S.C. § 552(b)(4) ("FOIA") and 47 C.F.R. § 0.457(d). Specifically, the Confidential Exhibits contain confidential trade secrets and commercial information regarding Varda's proposed satellite operations and systems, including information on the operational parameters of its in-orbit systems, trajectory and build of the WSERIES11 Spacecraft. Such information is not made available, routinely or otherwise, for public inspection. Accordingly, such information is exempt from disclosure and public inspection under FOIA and 47 C.F.R. § 0.457(d).

Varda further submits that the Confidential Exhibits warrant confidential treatment pursuant to 47 C.F.R. § 0.459. The full exhibits containing technical narrative for the WSERIES11 Spacecraft and WSERIES11 Spacecraft Orbital Debris Assessment Report contain trade secrets and confidential commercial information that are confidential and not made available to the public. Such information has not been disclosed previously by Varda and the release of such information to the public would cause substantial competitive harm to Varda. For the foregoing reasons, Varda respectfully requests long-term confidentiality for the above listed Confidential Exhibits.

For clarity, the following nine questions posed in 47 C.F.R. § 0.459(b) are answered as follows:

- (1) Identification of the specific information for which confidential treatment is sought
Answer: Varda requests the following experimental license application exhibits (each an "Exhibit" and collectively the "Exhibits") to be held confidentially:

Varda WSERIES11 Technical Narrative
Varda WSERIES11 ODAR

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

Answer: The Exhibits have been submitted in connection with Experimental License Application File Number 1427-EX-ST-2026.

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

Answer: Information contained throughout the Exhibits contains detailed sensitive commercial and technical trade secrets regarding vehicle architecture, system designs and operational specifications of the WSERIES11 Spacecraft and associated payloads.

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

Answer: The Exhibits contain detailed information throughout each of them about the commercial services provided by Varda. As the space industry continues its exponential growth, more companies are being formed to harness the microgravity environment of low Earth orbit (LEO) to manufacture materials for customers. No less than half a dozen companies worldwide seek to perform microgravity manufacturing services, of which Varda is one. As these companies compete for customer contracts against each other, it is imperative that Varda protect its designs and systems from others who may seek to use this information to upgrade their own systems or undermine Varda's commercial success. Confidential treatment of the Exhibits protects Varda from such impermissible uses by competitors (current and future).

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

Answer: As Varda is one of the first to market to provide manufacturing services in low Earth orbit (LEO), and to provide commercial in situ hypersonic testing capabilities, it is imperative that the information held in the Exhibits is held confidentially to limit the ability of competitors (both current and future) from accessing the trade secret information related to Varda's WSERIES11 Spacecraft. Varda has expended and committed significant resources to develop these capabilities on its own, and thus disclosure of such information in the Exhibits to competitors would significantly reduce time to market for Varda's competitors and jeopardize American interests.

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

Answer: Varda follows industry-standard security protocols to ensure all data is stored on Company secure systems. All material containing confidential information and trade secrets and proprietary commercial information is marked with legending such as "Varda Confidential Commercial Information/Trade Secrets and FOIA Exempt."

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

Answer: Information related to trade secrets of Varda listed in the Exhibits is not available to the public in any form and is shared with third parties only on a case-by-case, need to know basis, and only under strict terms of confidentiality and nondisclosure.

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

Answer: Varda respectfully requests indefinite confidentiality for the Exhibits. As discussed above, disclosure of this information, even years or decades in the future, could lead to substantial competitive harm to Varda and jeopardize American interests and capabilities.

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

Answer: Varda has provided herein all the information it believes necessary to grant this request, and respectfully reserves the right to provide more information in the future if necessary or requested by the Commission.

Thank you for your consideration of this request and please contact me at your convenience if you have any further questions about this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Daniel R. Czerwonka". The signature is fluid and cursive, with a large, sweeping initial "D".

Daniel R. Czerwonka
General Counsel
Varda Space Industries, Inc.