

Date: October 15, 2019
Subject: Market Trial Narrative and Technical Exhibit
File Number: 0829-EX-CN-2019

Pursuant to 5 U.S.C. § 552 and Sections 0.457 and 0.459 of the rules of the Federal Communications Commission (“Commission”), Walt Disney Parks and Resorts U.S., Inc. (“WDPR”) hereby requests that certain information contained in the above-referenced application for an experimental license and accompanying exhibits 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 to WDPR. As described below, WDPR’s request satisfies the standards for grant of such requests set forth in Sections 0.457 and 0.459 of the Commission’s rules, 47 C.F.R. §§ 0.457, 0.459.

In accordance with Section 0.459(b), 47 C.F.R. § 0.459(b), and in support of this request, WDPR provides the following information:

1. Identification of the information for which Confidential Treatment is Sought

WDPR’s request for confidential treatment is limited to information between the headings [***BEGIN CONFIDENTIAL INFORMATION***] and [***END CONFIDENTIAL INFORMATION***] that has been redacted from the experimental license application and accompanying exhibits.

2. Identification of the circumstance giving rise to the submission

WDPR is submitting an application for an experimental license to test certain aspects of wireless operations in the 4.9 GHz band.

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

The information for which confidential treatment is requested has significant commercial and strategic value to WDPR. The exhibit supporting the application discusses tests and experiments that include trade secret information. WDPR’s tests and experiments and proprietary wireless applications using particular radio frequency equipment and shared spectrum technology represent a “secret commercially valuable plan” within the meaning of a trade secret as recognized by the Commission, and thus justifies withholding such information from public inspection.

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

WDPR is planning to test potential wireless operations in the 4.9 GHz band. The services and technologies that are the subject of this application have not been fully developed, but are expected to lead to material developments in markets subject to fierce competition.

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

The technology under test is very sensitive and confidential in nature. Disclosure of the redacted information could cause substantial competitive harm to WDPR because it would provide competitors

insight into confidential development, operational, and strategic information that would not otherwise be available in the public domain or made available to third parties.

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

WDPR routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

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 information contained in the confidential exhibit is not available to the public and has not been previously disclosed to third parties.

8. Justification of the requested period of confidentiality

WDPR requests that the redacted information be treated as confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to WDPR.

Exhibit A – Experimental License Market Trial Justification

Pursuant to Section 5.63(c)(1) of the Federal Communications Commission’s (“FCC” or “Commission”) Rules, Walt Disney Parks and Resorts U.S., Inc. (“WDPR”) is providing this narrative statement in support of its application for an experimental license to test *****BEGIN CONFIDENTIAL INFORMATION***** *****END CONFIDENTIAL INFORMATION*****. WDPR seeks a regular license term of two (2) years from grant for the market trial. WDPR respectfully requests that the FCC act on this application as expeditiously as possible.

WDPR seeks permission to test low-power mobile wireless operations in the 4910-4990 MHz band, for purposes of *****BEGIN CONFIDENTIAL INFORMATION***** *****END CONFIDENTIAL INFORMATION*****.

Planned Operations

WDPR anticipates performing the following tests pursuant to the experimental license:

- 4.9 GHz device coverage and performance:
 - o *****BEGIN CONFIDENTIAL INFORMATION***** *****END CONFIDENTIAL INFORMATION*****

Non-Interference

Operation under the experimental license will not adversely impact any authorized user of radiofrequency spectrum, including but not limited to licensed users of the 4940-4990 MHz public safety spectrum.

Exhibit B – Technical Information:

Applicant Name: Walt Disney Parks and Resorts U.S., Inc.

Applicant FRN: 0001527605

Legal Contact Details:

Name of Contact	Tom W. Davidson, Esq.
Contact Address	2001 K Street, N.W. Washington, DC 20006

Technical Contact Details:

Name of Contact	Susan Fox, Esq.
Contact Address	425 3rd Street SW, Suite 1100 Washington, D.C. 20024

Equipment General Information

Equipment	***BEGIN CONFIDENTIAL INFORMATION*** [REDACTED] [REDACTED] ***END CONFIDENTIAL INFORMATION***
Quantity	655
Area of Operation	Operation not to exceed 1 km from the following geographic center points: 33° 48' 44" N, 117° 55' 8" W 28° 22' 30" N, 81° 32' 58" W 28° 21' 28" N, 81° 33' 30" W

Amplifier Detail

Antenna	External
Type	Omni
Gain	2.5 dBi
Beamwidth at Half-Power Point	N/A
Orientation in Horizontal Plane	N/A
Orientation in Vertical Plane	N/A
Lower Frequency	4910 MHz
Upper Frequency	4990 MHz
Power (and Power units)	10 mW
ERP (and ERP units)	13.65 mW
Mean / Peak (for power)	Peak
Frequency Tolerance	0.0025%

Modulation	Emission Designator	Bandwidth	Maximum Output Power	Maximum EIRP
OFDM	20M0D1D	20 MHz	10 mW	13.65 mW