

January 3, 2017

MET Laboratories, Inc.
914 West Patapsco Avenue
Baltimore, MD 21230

RE: CONFIDENTIALITY REQUEST FOR THE MULTI-PROTOCOL BASE-
TRANSCIVER SYSTEM (MPBTS); FCC ID#s: 2AFYU67287, 2AFYU26636

To Whom It May Concern:

This letter serves as The KEYW Corporation's ("KeyW") official request, pursuant to 47 C.F.R. § 0.459 and 47 C.F.R. § 0.457, that the following items required to be submitted with this application be treated as confidential and permanently withheld from public review.

1. MPBTS Radio Block Diagram
2. MPBTS Amplifier Block Diagram
3. MPBTS Duplexer Block Diagram
4. MPBTS Radio Bill of Materials
5. MPBTS Amplifier Bill of Materials
6. MPBTS Duplexer Bill of Materials
7. MPBTS Radio Schematics
8. MPBTS Amplifier Schematics
9. MPBTS Duplexer Schematics
10. MPBTS Operational Description
11. MPBTS Manuals
12. All Internal Photos
13. SDR Security Description

While KeyW recognizes that this request may not be necessary, as the above-listed items likely fall within Section 47 C.F.R. § 0.457(d) (non-disclosure of trade secrets), and are therefore not routinely made available for public inspection pursuant to 5 U.S.C. § 552(b), KeyW hereby requests, in an abundance of caution, that the above-listed items and information be permanently restricted from public inspection and review as public disclosure of same could cause significant competitive harm to KeyW.

In accordance with such request, and pursuant to 47 C.F.R. § 0.459(b)(1)-(9), KeyW hereby submits the following information in support of its request:

1. The above-listed items contain information that is both highly confidential and proprietary technical information concerning KeyW's MBPTS product design and operating characteristics. As such, KeyW respectfully requests that the above-listed items and

information be treated as confidential and withheld from public review and inspection.

2. Disclosure of technical information contained in the above-listed items to competitors of KeyW would likely compromise KeyW's ability to sell and continue to develop similar products to the MPBTS product, as competitors of KeyW could reverse engineer the product by using such technical information.
3. KeyW is one of many companies that provide equipment and products to federal, state and local government agencies. As such, any release of technical information concerning such products, including the MPBTS product and the information listed above relating thereto, would result in competitors gaining access and insight to KeyW proprietary and confidential information, including the development and manufacturing process of the MPBTS product. Such access would provide competitors of KeyW an unfair advantage.
4. Disclosure of the above-listed items and information could result in substantial, and almost certainly, irreparable competitive harm to KeyW, as such disclosure would provide competitors with insight into KeyW's proprietary and confidential product development process, potentially allow competitors to reverse engineer the product, and ultimately afford competitors an unfair advantage in the market.
5. KeyW takes great efforts to ensure its confidential and proprietary information remain protected at all times. KeyW confidential and proprietary information is not disclosed to the public, and such information is only disclosed to third parties following the execution of a non-disclosure agreement.
6. As stated above, KeyW confidential and proprietary information, including, but not limited to the items and information listed above, are not, and have not been, disclosed to the public.
7. KeyW respectfully requests that the above-listed items and information be permanently withheld from public review and inspection. As the MPBTS product is intended to be used for many years, perhaps even decades in some circumstances, KeyW believes such information should be withheld permanently.

Again, KeyW recognizes that this request may not be necessary, as the above-listed items and information contained therein likely fall within Section 47 C.F.R. § 0.457(d) (non-disclosure of trade secrets), and are therefore not routinely made available for

public inspection pursuant to 5 U.S.C. § 552(b). As the Commission may be aware, the MPBTS product is meant for use by federal, state and local government agencies. As such, KeyW, has submitted this request for long term confidentiality as public disclosure of such information would constitute a release of KeyW trade secrets and proprietary and confidential information, and therefore provide many, if not all, of KeyW's competitors in the industry with an unfair competitive advantage resulting in substantial competitive harm to KeyW.

Based upon the foregoing reasons, KeyW requests that the Commission grant KeyW's request to permanently treat the above-listed items and information as confidential and withhold same from public review and inspection. If the Commission requires any further information in its consideration of this request, please contact Bill LeBeau at bill.lebeau@hklaw.com or Jennifer Litwak at jmlitwak@keywcorp.com or (443) 733-1615, or, if the Commission declines to grant KeyW's request for confidentiality, please return all materials provided to the Commission to the attention of the undersigned at the address listed above.

Sincerely,



Philip Luci, Jr.
Vice President and General Counsel