



September 8, 2023

Attention: Application Examiner

Re: Request for Confidentiality
Applicant: Starry, Inc.
FCC ID: 2AGZ3S01511

To Whom It May Concern:

Permanent Confidentiality

Request is hereby submitted by Starry, Inc. (Starry) to withhold permanently from public review certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept permanently confidential:

- Schematics
- Detailed Block Diagrams
- Detailed Operational/Functional Description
- Tune up procedure
- Parts list
- Internal photos
- User Manual

Short-Term Confidentiality

Request is hereby submitted by Starry, Inc. to withhold from public review for a period of 45 days from the date of the Grant of Equipment Authorization and prior to marketing, certain portions of the application for equipment certification for the referenced FCC identifiers. This request for confidentiality is made pursuant to 47 CFR 0.457(d) and 0.459 of the FCC Rules. In particular, the following sections of the application are to be kept confidential for a period of 45 days from the date of Authorization:

- Test setup photos
- External photos

Rationale for request for confidentiality:

The exhibits for which Starry requests long-term confidential treatment all contain confidential, proprietary technical information that the Commission protects from disclosure as a type of record that is not routinely available for public inspection.¹ Disclosure of the exhibits for which Starry seeks short-term confidential treatment during the period of importation and/or distribution would reveal key aspects of proprietary technology to competitors and significantly diminish the value of our investment in research and development.

¹ 47 C.F.R. § 0.457(d)

Starry has invested considerable time and materials in research and development to produce the referenced product. To protect its investment, Starry does not release this information in the ordinary course of its business because doing so would result in substantial competitive harm to Starry. Disclosure of these confidential exhibits to competitors would not only give them significant competitive advantages in developing similar products, but would also disclose successful implementation of unpublished, leading edge technology developed by Starry and could even reveal information about Starry's unique economic model.

Among the exhibits for which Starry seeks long-term confidential treatment are internal photos. It is appropriate to accord such treatment to the internal photos submitted for two reasons. First, some of these photos are scanning receiving internal photos, which, by rule, the Commission does not make available for inspection.² Second, long-term confidential treatment for all other internal photos is also warranted because the referenced product is a non-consumer device that is not sold to end users, nor is it accessible to the general public. These devices are mounted on the top of a large tower or in a locked area, such as a rooftop, and are only serviceable by professional, designated Starry technicians and partners under a Non-Disclosure Agreement (NDA). An example of the NDA between Starry and its technicians and partners is provided herein.

Starry also seeks long-term confidential treatment for the user manual of the referenced product. The manual for this product contains confidential proprietary technical information and is only shared outside the company with professional, designated Starry technicians and partners under an NDA. The manual is not provided to end users because this is a non-consumer device that is not available for sale and end users of the device do not have access to it and cannot service it. Therefore, long-term confidential treatment of the user manual is also warranted.

If you have questions or need further information, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Lagoy', written in a cursive style.

Ryan C. Lagoy
Director, Hardware and Systems Engineering
Starry, Inc.
September 8, 2023

² See 47 C.F.R. § 0.457(d)(1)(ii) (“Portions of applications for equipment certification of scanning receivers and related materials will not be made available for inspection.”).