



STARRY

Date: September 11, 2023

Attn: FCC Office of Engineering and Technology / UL Verification Services TCB

Subject: Request for Confidentiality

FCC ID: 2AGZ3S01711

To Whom It May Concern:

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's rules (47 CFR §§ 0.457, 0.459), we are requesting the Commission to withhold the following attachments as confidential document from public disclosure indefinitely.

- Schematics
- Detailed Block Diagrams
- Detailed Operational/Functional Description
- Calibration Documentation
- Parts list/BOM
- Internal photos
- User Manual

Above mentioned document contains detailed system and equipment description are considered as proprietary information in operation of the equipment. The public disclosure of above documents might be harmful to our company and would give competitor an unfair advantage in the market.

In additional to above mentioned documents, pursuant to Public Notice DA 04-1705 of the Commission's policy, in order to comply with the marketing regulations in 47 CFR §2.803 and the importation rules in 47 CFR §2.1204, while ensuring that business sensitive information remains confidential until the actual marketing of newly authorized devices. We are requesting the commission to grant short-term confidentiality request on the following attachments for a period of 45 days from the date of Authorization:

- External Photos
- Test Setup Photos

It is our understanding that all measurement test reports, FCC ID label format and correspondent during certification review process cannot be granted as confidential documents and those information will be available for public review once the grant of equipment authorization is issued.

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.

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 buildings, 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.

Best Regards,

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

Ryan Lagoy
Director, Hardware and Systems Engineering

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¹ 47 C.F.R. § 0.457(d)

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.”).