

Starfish Space
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January 8th, 2026

FILED ELECTRONICALLY

Mr. Jon Markman
Acting Chief, Satellite Programs & Policy Division
Space Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Starfish Space Inc.
File No: SAT-LOA-20251230-00413

Dear Mr. Markman:

Pursuant to Sections 0.457(d) and 0.459 of the FCC Rules, 47 CFR §§ 0.457(d) and 0.459, the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), and the Trade Secrets Act, 18 USC § 1905, Starfish Space Inc. (“Starfish”) respectfully requests that the confidential information submitted herewith (the “Confidential Materials”) not be placed in the public file and be otherwise withheld from public inspection.

1. Identification of the specific information for which confidential treatment is sought: The Confidential Materials consist of an attachment entitled “Otter 24C LOA Technical Annex” and “Otter 24C LOA Orbital Debris Mitigation Plan”, both of which are submitted as part of application SAT-LOA-20251230-00413.

2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission: Starfish is submitting the Confidential Materials to its above referenced application file, as requested by the Commission rules.

3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged: The Confidential Materials contain detailed proprietary technical and commercial information relating to Starfish’s spacecraft design and its concept of operations (“CONOPS”). This information, including detailed information about the Otter 24C spacecraft’s fuel consumption during its mission and Starfish’s CONOPS for end-of-life disposal. As commercially sensitive information, these details constitute trade secrets.

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

competition: Starfish's innovative approach to operating a relatively small spacecraft with sufficient thrust is subject to significant competition as operators seek to compete in the growing space services market. Public disclosure of the Confidential Materials would enable Starfish's competitors to access and examine sensitive commercial information typically kept confidential.

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

Disclosure of confidential materials would provide competitors significant and detailed information into the capabilities of the Starfish system, potentially allowing them to reverse engineer proprietary Starfish operational details. Consequently, any public disclosure of the information contained in the Confidential Materials is likely to cause significant competitive injury and substantial irreparable harm. Accordingly, the Confidential Materials qualify for protection under FOIA exemption 4 and Section 0.457(d) of the Commission's rules.

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

Starfish has implemented substantial and reasonable precautions to prevent unauthorized disclosure of the Confidential Materials. These measures include storing proprietary data exclusively on a secure cloud server and, where appropriate, informing recipients of their protected and proprietary status prior to any related oral disclosure(s) are made. Moreover, any disclosure of the Confidential Materials to external entities has been conducted under the terms of a legally binding nondisclosure agreement or is subject to attorney-client privilege.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

To the best of the Starfish's knowledge, as of the date of this submission, the information contained within the Confidential Materials is not currently available to the public, and Starfish does not intend for it to be released for wider distribution at this time. Any prior disclosure of the information to third parties has been strictly controlled and subject to the aforementioned restrictions to ensure confidentiality.

8. Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

Starfish respectfully requests that the Confidential Materials be withheld from public disclosure by the Commission indefinitely or for the maximum permissible time. Starfish holds proprietary rights to its confidential commercial information and has expended substantial financial and non-monetary resources to organize and develop the capabilities outlined in the Confidential Materials. Additionally, Starfish has implemented significant precautionary measures to preserve and safeguard its confidential information, including the information contained in the Confidential Materials.

Based on the reasons outlined above, the Commission should grant Starfish's limited Request for Confidential Treatment, thereby refraining from placing the Confidential Materials in the public file and otherwise withholding from public inspection.

Respectfully submitted,

Jeffrey Liu
Mission Manager