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VIA HAND DELIVERY

August 23, 2011

Mr. Julius P. Knapp
Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Request for Additional Information

Dear Mr. Knapp:

Deere & Company (“Deere” or “Company”), pursuant to 5 U.S.C. § 552, Sections 0.457 and 0.459 of the Commission’s Rules, through its undersigned counsel, requests that certain information in Response to Request for Additional Information (“Response”) in the Matter of LightSquared Subsidiary, LLC, Request for Modification of its Authority for an Ancillary Terrestrial Component (“Proceeding”) be treated as confidential and not subject to public inspection. The Response contains confidential and proprietary information that, if subject to public disclosure, would cause significant commercial and competitive harm to Deere. As described below, Deere’s request satisfies the standards for grant of this request as set forth in Sections 0.457 and 0.459 of the Commission’s Rules.

In accordance with Section 0.459(b) and in support of its request, Deere provides the following information:

(1) Identification of Confidential Materials: Deere seeks confidential treatment of specific information contained in its Response dated August 23, 2011. Specifically, competitively sensitive product information that has been redacted from the Response, and those portions containing confidential information are appropriately stamped “CONFIDENTIAL.”

(2) Circumstances Giving Rise to Submission of Information: The information contained in and filed with Deere’s Response was requested by Julius P. Knapp, Chief, Office of Engineering and Technology of the FCC as part of the above-referenced proceeding.¹ Deere hereby voluntarily provides the requested information to the Commission in order to facilitate its review in this Proceeding.

¹ See Letter to Jeffrey Carlisle, LightSquared Subsidiary, LLC and Charles R. Trimble, U.S. GPS Industry Council, from Julius P. Knapp, Chief, Office of Engineering and Technology, FCC, IB Docket No. 11-109 (rel. Aug. 10, 2011).

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(3) Degree to Which Information is Commercial or Financial: This information is of a highly sensitive commercial nature and contains data and information concerning Deere's business operations.

(4) Degree to Which the Information Concerns a Service Subject to Competition: The above-referenced Response contains information on Deere's product information. Such information is directly related to Deere's development and sales of high precision equipment offered for use in agricultural, construction and survey applications. Multiple other companies also manufacture and sell high precision equipment for use in similar applications, including Trimble, and Deere would be competitively disadvantaged if such information were publicly released.

(5) How Disclosure Could Result in Substantial Harm: Disclosure of Deere's confidential information would advantage its competitors by revealing sensitive product information, thereby giving competitors a competitive advantage. This information and analysis could be used by competitors to damage Deere's position in the market and future potential growth.

(6) Measures Taken to Prevent Disclosure: Deere holds the information provided in this submission in strict confidence. Deere has not routinely disclosed its product information in this level of detail except under conditions of confidentiality.

(7) Public Access to Information, Third Party Disclosure: Deere has not made this information publicly available through previous disclosures.

(8) Justification of the Period During Which the Material Should Not be Publicly Available: Deere requests that the Commission hold this information out of public view for five years. Release of this information would cause substantial harm to Deere as it would detail its business and commercial operations and plans.

(9) Additional Information: Release of the forgoing information would have a serious detrimental impact on the business operations and plans of Deere. Due to the sensitive nature of this information, Deere respectfully requests that the Commission treat this filing as confidential and withhold the same from public inspection for the timeframe set forth herein. Additionally, public inspection of this confidential information is not necessary for the Commission to make a determination on Deere's Response. Deere has also simultaneously filed a copy of the filing marked "Redacted - For Public Inspection" so that the non-confidential information contained in the filing may be made available for public inspection.

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Please contact the undersigned should you have any questions concerning the Deere's request for confidentiality pursuant to the Commission's rules. Please date-stamp the enclosed extra copy of this filing and return it in the self-addressed envelope provided.

Sincerely,

/s/

Catherine Wang
Timothy L. Bransford

Counsel for Deere & Company