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September 11, 2015

Jose Albuquerque
Chief, Satellite Division-International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Iridium Satellite LLC
Iridium Carrier Services LLC
Request for Authority to Provide Transmit and Receive
Aeronautical Mobile Satellite (Route) Service
Call Signs E960132 and E960622
File Nos. SES-MOD-20130416-00322 and SES-MOD-
20130416-00323.

REQUEST FOR CONFIDENTIAL TREATMENT

Dear Mr. Albuquerque:

Iridium Satellite LLC and Iridium Carrier Services LLC (collectively, "Iridium") previously filed the above-referenced applications (the "Applications") for authority to provide transmit and receive Aeronautical Mobile Satellite (Route) Service ("AMS(R)S"). By letter dated August 7, 2015, the Satellite Division of the Commission's International Bureau requested that Iridium furnish additional information concerning, among other things, the antennas to be employed.¹ Iridium is submitting a response to the Bureau Request today (the "Iridium Response").

In the public copy of the Iridium Response, Iridium has redacted portions of the technical documentation provided to it by AeroAntenna Technology, Inc. ("AAT"), the

¹ Letter from Paul E. Blais, Chief, Systems Analysis Branch, Satellite Division, International Bureau, Federal Communications Commission (the "Commission") to Joseph A. Godles, Counsel to Iridium (August 7, 2015)(the "Bureau Request").

manufacturer of two of the antennas Iridium proposes to employ. The redacted technical documentation was provided to Iridium by AAT on the condition that it be maintained as confidential.

Iridium is delivering a non-redacted copy of the Iridium Response to the Commission separately on a confidential basis. Pursuant to Sections 0.457(d) and 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4), Iridium hereby requests confidential treatment for the redacted portions of AAT documentation that is submitted with the Iridium Response.

I. THE REDACTED INFORMATION CONTAINS COMMERCIAL OR FINANCIAL INFORMATION AND TRADE SECRETS THAT ARE ENTITLED TO PROTECTION UNDER FOIA EXEMPTION 4 AND PARALLEL COMMISSION RULES.

Section 0.457(d) of the Commission's rules, which is based on FOIA Exemption 4, provides for protection from disclosure for "trade secrets and commercial or financial information obtained from any person and privileged or confidential." The information redacted from the Iridium Response falls within this definition.

The redacted information consists of radiation patterns and equipment photographs that AAT deems confidential and proprietary and does not permit to be made public. Iridium and AAT have taken steps, including the legends on the materials themselves, to restrict public disclosure. Access to these materials is limited in each company to personnel who have a need to know such information in the performance of their duties. None of the information that is redacted from the Iridium Response has been disclosed to the public in unredacted form.

II. DISCLOSURE OF THE REDACTED INFORMATION WOULD CAUSE IRIDIUM AND AAT COMPETITIVE HARM.

The Commission has recognized it should not require the public disclosure of information that might put a regulated entity at a competitive disadvantage.² That policy applies in the present circumstances.

Iridium and AAT each operates in a highly competitive environment. The release of the proprietary and confidential information that has been redacted would give competitors an unfair competitive edge by revealing to them confidential and proprietary information about Iridium's and AAT's businesses. Such a release also could make AAT and other Iridium suppliers unwilling to make products available to

² See, e.g., *Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission*, 13 FCC Rcd 24816, 24822 (1998).

Iridium in the future, or to assist Iridium in responding to FCC information requests regarding their products, when the products have confidential design elements.

III. SUBSTANTIAL TECHNICAL INFORMATION REGARDING THE ANTENNAS IN QUESTION AND IRIDIUM'S OVERALL SYSTEM OPERATIONS IS MADE PUBLIC

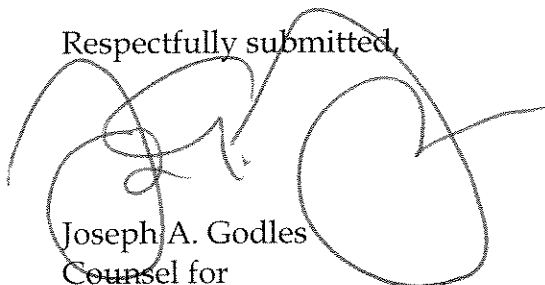
Substantially all of the information Iridium is submitting in response to the Bureau Request, including detailed technical information regarding its proposed operations, is submitted for the public record. Now that this information is publicly available, there should be no need for public review of the limited information that Iridium has been requested to redact by AAT. Conversely, requiring Iridium to make public information required by its manufacturer to be held confidential would cause substantial injury.

Given these circumstances, "a balancing" of the interests favoring disclosure and non-disclosure³ weighs heavily in favor of allowing non-disclosure of the information that has been redacted.

IV. CONCLUSION

For the reasons stated herein, Iridium requests that the Commission withhold from public inspection the information that has been redacted from the Iridium Response. If its request is not granted, Iridium asks that all non-public materials be returned to it.

Respectfully submitted,



Joseph A. Godles
Counsel for
Iridium Satellite LLC
Iridium Carrier Services LLC

³ *Id.*