Google

Federal Communications Commission
7435 Oakland Mills Road
Columbia MD 21046

Date: November 29, 2019
Subject: Request for Confidentiality
FCC ID: A4RG020B

To Whom It May Concern:

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's rules (47 C.F.R. §§ 0.457, 0.459), we request that the Commission withhold the following attachments as confidential documents from public disclosure indefinitely.

- Operational Descriptions
- Tune Up Procedure

In support of this request, we provide the following information:

1. **Identification of the specific information for which confidential treatment is sought (§ 0.459(b)(1)):** We request that all of the information contained in the above-referenced exhibits to the application for Class II Permissive Change be withheld from routine public disclosure.

2. **Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission (§ 0.459(b)(2)):** The material is being submitted in connection with our application for Class II Permissive Change for the above-captioned FCC ID.

3. **Explanation of the degree to which the information is commercial, or financial or contains a trade secret or is privileged (§ 0.459(b)(3)):** The market for the technology that is the subject of the application is highly competitive, with numerous companies competing for the business of potential customers. Were competitors to become aware of the facts set forth in the above-referenced exhibits to the application at this time, it could have an adverse impact on our competitive standing and deprive us of the marketplace benefit we otherwise might achieve by virtue of having the product available before other competitors. If any of the information for which confidential treatment is sought was made publicly available, competitors could reasonably determine the scope and status of our activities.

4. **Explanation of the degree to which the information concerns a service that is competitive (§ 0.459(b)(4)):** The technology that is the subject of the application is subject to intense competition from other manufacturers and service providers that are developing competing services and technology.

5. **Explanation of how disclosure of the information could result in substantial competitive harm (§ 0.459(b)(5)):** As noted above, were our competitors to become aware of the facts set forth in the above-referenced exhibits to the application, it could have an adverse impact on our competitive standing and deprive us of the marketplace benefit we otherwise would achieve by virtue of having the product available before other providers.

6. **Identification of any measures taken by the requesting party to prevent unauthorized disclosure (§ 0.459(b)(6)):** The information contained in the above-referenced exhibits to the application has been strictly controlled by us, with distribution limited to internal use only and for the specific purpose of conducting research, development, and testing of the technology.

7. **Identification of whether the information is available to the public and the extent of any previous disclosures of the information to any third parties (§ 0.459(b)(7)):** The information that we request be maintained as confidential is not available publicly. The information has been protected and kept confidential by limiting external contacts to privileged and confidential communications.

8. **Justification of the period during which the submitting party asserts that material should not be available for public disclosure (§ 0.459(b)(8)):** Given the competitive nature of the marketplace, any disclosure that we have developed the technology discussed in the above-referenced exhibits to the application would harm our competitive position. The information subject to this request for confidentiality should not be made available for public disclosure at any time.

Sincerely,

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John McNulty
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