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Federal Communications Commission
Laboratory Division
7435 Oakland Mills Road
Columbia, MD 21046

Date: November 8, 2018
Subject: Request for Confidentiality
Application: Class II Permissive Change
FCC ID: A4RG013A
Original grant date: 08/31/2018

To Whom It May Concern:

Pursuant to Sections 0.457 and 0.459 of the Commission's rules (47 CFR §§ 0.457, 0.459), Google LLC (Google) requests that the Commission indefinitely withhold from public disclosure the following attachments associated with the certification application for the above-referenced FCC ID:

- Operational Description
- Tune-up Procedure

In support of this request, Google provides the following information:

1. **Identification of the specific information for which confidential treatment is sought (§ 0.459(b)(1)):** Google requests that all of the information contained in the above-referenced exhibits to the certification application 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 Google's Class II permission change application for FCC ID A4RG013A.



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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 certification application is highly competitive, with numerous companies competing for the business of potential customers. Were Google's 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 Google's competitive standing and deprive Google of the marketplace benefit it otherwise might achieve by virtue of having the product available before other competitors. If any of the information for which confidential treatment is sought were to be made publicly available, Google's 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 certification 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 Google's competitors to become aware of the facts set forth in the above-referenced exhibits to the application, it could have an adverse impact on Google's competitive standing and deprive Google of the marketplace benefit it 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 certification application has been strictly controlled by Google, 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 Google requests 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 Google has developed the technology discussed in the above-reference exhibits to the certification application would harm Google's competitive position. The information subject to this request for confidentiality should not be made available for public disclosure at any time.



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It is our understanding that test measurement reports and correspondence during the certification review process cannot be granted confidential treatment, and such information will be available for public review once the grant of equipment authorization is issued.

Sincerely yours

A handwritten signature in black ink, appearing to read "H Zhao".

Helen Zhao
Regulatory Certification Program Manager
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