

Date: February 24, 2022
Subject: Request for Confidential Treatment and Complementary Exhibits
File Number: 0382-EX-ST-2022

Pursuant to 5 U.S.C. § 552 and Sections 0.457 and 0.459 of the Commission's Rules, Vectrus Systems Corporation (VSC) hereby requests that certain information contained in the above-referenced application for an Experimental Special Temporary Authority (STA) and accompanying exhibits be treated as confidential and not subject to public inspection. The designated information constitutes confidential and proprietary information that, if subject to public disclosure, would cause significant commercial, economic, and competitive harm to VSC. As described below, VSC's request satisfies the standards for grant of such requests set forth in Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§ 0.457, 0.459.

In accordance with Section 0.459(b), 47 C.F.R. § 0.459(b), and in support of this request, VSC provides the following information:

1 IDENTIFICATION OF THE INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT

VSC's request for confidential treatment is limited to information that has been redacted from the STA application and associated exhibits. VSC requests confidential treatment of the information underlined and highlighted below and redacted from the publicly filed version of Exhibits A and B that contains confidential and proprietary information regarding the proposed experimentation for which Commission authorization is requested in the instant application.

2 IDENTIFICATION OF THE CIRCUMSTANCE GIVING RISE TO THE SUBMISSION

VSC is submitting an application for extension of an STA to test certain aspects of prospective wireless operations in the 3.5 GHz band.

3 EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION IS COMMERCIAL OR FINANCIAL OR CONTAINS A TRADE SECRET OR IS PRIVILEGED:

The information for which confidential treatment is requested has significant commercial and strategic value to VSC. The exhibits supporting the STA application discuss tests/experiments that include trade secret information. VSC's tests and experiments and proprietary wireless applications using particular radio frequency equipment and shared spectrum technology represent a "secret commercially valuable plan" within the meaning of a trade secret as recognized by the Commission, and thus justifies withholding such information from public inspection.

4 EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS COMPETITIVE:

VSC is planning to test its shared spectrum solutions, and operation of small cells in the 3.5 GHz band. The services and shared spectrum technologies that are the subject of this application have not

been fully developed, but are expected to be implemented in hardware, software, and service offerings in the 3.5 GHz band. SAS Administrators, equipment manufacturers, and software developers and network operators compete vigorously on the basis of their products in this band.

5 EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM

The technology under test is very sensitive and confidential in nature. Disclosure of the redacted information could cause substantial competitive harm to VSC because it would provide competitors insight into confidential development, operational, and strategic information that would not otherwise be available, which would work to VSC's competitive disadvantage.

6 IDENTIFICATION OF ANY MEASURES TAKEN BY THE REQUESTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE.

VSC routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public. VSC has taken steps to keep confidential the information set forth in the confidential exhibits by limiting the number of people involved in the tests/experiments to only those on a "need to know" basis, and by requiring that any third parties involved in the preliminary analysis execute robust nondisclosure agreements.

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

The information contained in the confidential exhibits is not available to the public, and will only be disclosed to third parties pursuant to the restrictive safeguards described above.

8 JUSTIFICATION OF THE REQUESTED PERIOD OF CONFIDENTIALITY

VSC requests that the redacted information be treated as confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to VSC. Shared spectrum is a new technology that is continually being developed and evolved. As such, VSC expects that confidential treatment will be necessary for the length of the proposed experiment and thereafter in order to protect its evolving business and technology strategies.

Consistent with 47 C.F.R. § 0.459(d)(1), VSC requests notification if release of the information subject to this request is requested pursuant to the FOIA or otherwise, so that it may have an opportunity to oppose grant of any such request.

Exhibit A – Description of Planned Experimentation

Consistent with the standards set forth in Section 5.61 of the Commission’s Rules, 47 C.F.R. § 5.61, VSC submits this statement in support of its application for an STA to continue testing previously authorized under STA, call sign WS9XOF, issued to VSC subsidiary Vectrus Mission Solutions Corporation, to validate [REDACTED]. Operations under this STA will be consistent with the Part 96 rules the Commission has adopted to govern use of the 3.5 GHz band and entirely consistent with the parameters authorized under experimental STA WS9XOF. The STA is sought for a period of 180 days beginning on February 26, 2022. VSC outlines below its need for the requested STA and the reasons that the STA should be granted expeditiously.

Planned Operations

VSC will perform the following tests as part of the STA:

- VSC will deploy [REDACTED]
 - [REDACTED]
 - [REDACTED]
- VSC will work with [REDACTED]. The SAS will be used to provide spectrum management and incumbent protections in the operation of the devices under experiment, consistent with the Commission’s Part 96 rules.
- STA is required to support this program of experimentation because [REDACTED].

Location of Operations

The location of the test site is in Ashland, VA. Tests will be conducted indoors at the following GPS coordinates: 37.714965, -77.445164.

Non-Interference Analysis

Operation under the STA will not adversely impact any authorized user of RF Spectrum. Risk of interference is very low based on the use of the SAS for incumbent protection, the low number of nodes (2) and the lower power to be used for the indoor-only operations pursuant to the STA.

VSC will work offline with its SAS administrator to ensure that prior to initial testing, and throughout the testing period, only clear spectrum will be used, and that no interference will arise to other possible users of this band, including incumbent and GAA users. This is accomplished by providing the SAS administrator all the CBSD system parameters normally used during CBSD registration (but offline), then SAS runs an interference analysis with the input data, just as if the CBSD were connected

to a SAS. The offline interference analysis will be run periodically, prior and throughout the testing period. There have been no reports of interference during the term of STA WS9XOF.

There will be no operations in 3700-3800 MHz. This application seeks experimental special temporary authority for only the CBRS frequencies at 3550-3700 MHz.

Radar Protection (Shoreline)

This location is within the Category A neighborhood distance. SAS will manage the spectrum allocation for this location, and will prefer the upper 50 MHz for operations.

Federal Government Radiolocation Facilities

The location is outside of the 80 km restricted area for the Federal radiolocation facilities located in St. Inigoes, Maryland, Pensacola, FL, and Pascaguoula, MS.

Ground Based Radar

There are no known in-land radar locations in the area of the trial.

International Border

The test site is removed from each of the Mexican and Canadian borders by hundreds of kilometers. Therefore, no interference to international incumbent operations is expected.

FSS Protection

There are no registered FSS operators within 150 km of the test site.

Part 90 Grandfathered Wireless Broadband Licensee (GWBL) Protection

There are no GWBLs within 40 km of the trial site.

Exhibit B – Technical Information:

Applicant Name: Vectrus Mission Solutions Corporation

Applicant FRN: 0031245483

Legal Contact Details:

Name of Contact	Jennifer Jiang
Contact Address	7901 Jones Branch Drive, Suite 700 McLean, VA 22102 703-657-8214
E-Mail Address	Jennifer.jiang@vectrus.com

Technical Contact Details:

Name of Contact	Jason Armstrong
Contact Address	PO Box 39710 Colorado Springs, CO 80949 540-663-1421 Jason.armstrong@vectrus.com
Backup Contact	Eugene Shaulis 571-926-8677 Eugene.shaulis@vectrus.com
Should any interference be reported, the proposed market trial operations will cease immediately unless and until the interference incident has been resolved. The technical point of contact above is the “stop buzzer” contact for all devices involved in the proposed experimentation.	

Base Station General Information

Equipment	[REDACTED]
Quantity	[REDACTED]
Antenna	External
Type	Omni
Power (and Power units)	500 mW
EIRP (and EIRP units)	27 dBm
Mean / Peak (for power)	Peak

CPE General Information

Equipment	[REDACTED]
Quantity	[REDACTED]
Antenna	External
Type	Omni
Power (and Power units)	200 mW
EIRP (and EIRP units)	23 dBm
Mean / Peak (for power)	Peak

UE General Information

Equipment	[REDACTED]
Quantity	[REDACTED]
Antenna	External
Type	Omni
Power (and Power units)	200 mW
EIRP (and EIRP units)	23 dBm
Mean / Peak (for power)	Peak

Equipment	[REDACTED]
Quantity	[REDACTED]
Antenna	External
Type	Omni
Power (and Power units)	200 mW
EIRP (and EIRP units)	23 dBm
Mean / Peak (for power)	Peak

Modulation and Emission Information

Radio	Modulation	Emission Designator	Bandwidth
[REDACTED]	Digital	20M0W7W 40M0W7W 60M0W7W	20 MHz 40 MHz 60 MHz
[REDACTED]	Digital	20M0W7W 40M0W7W 60M0W7W	20 MHz 40 MHz 60 MHz
[REDACTED]	Digital	20M0W7W 40M0W7W 60M0W7W	20 MHz 40 MHz 60 MHz
[REDACTED]	Digital	20M0W7W 40M0W7W 60M0W7W	20 MHz 40 MHz 60 MHz