

Applicant: The Boeing Company
File Number: 0279-EX-CN-2022
Correspondence Reference Number: 68374

CONFIDENTIALITY REQUEST

Submitted by:

The Boeing Company
Global Spectrum Management MC: 1K-105
P.O. Box 3707
Seattle, WA 98124-2207

1. Identification of the specific information for which confidential treatment is sought:

The information which requires confidential treatment is the description and depictions of the Varuna Vehicle and its subsystems that are contained in the document labeled as containing the Varuna Vehicle and Subsystem Overview.

2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

Boeing submitted this request for confidential treatment to protect certain aspects of the design of the experimental satellite that are confidential to its manufacturer, Astro Digital, and also to protect technical details regarding the experimental operations that Boeing would conduct during the Varuna mission.

3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The design of the experimental satellite is highly proprietary to Astro Digital and provides it with substantial commercial value. In addition, the details of the Varuna experimental mission are of commercial value to Boeing, which is one of a number of companies that are developing satellite systems that are designed to operate in millimeter wave frequency bands..

4. Explanation of the degree to which the information concerns a service that is subject to competition:

Both the satellite manufacturing and space services industries are subject to extremely high levels of competition in the current market, requiring both manufacturers and system operators to take significant measures to protect the commercial value of their products and services.

5. Explanation of how disclosure of the information could result in the substantial competitive harm:

The disclosure of the design of the Varuna Vehicle could harm the competitive position

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of Astro Digital by disclosing to its competitors its technical measures for housing and launching multiple payloads on a single platform. Further, the disclosure of the technical details of the Varuna mission would likely harm Boeing given the significant attention that exists within the industry on the development of satellite communications systems using millimeter wave frequency bands.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

Both Boeing and Astro Digital have classified the information as “Confidential Information.” Disclosure within both companies is limited to those individuals within each respective organization with a need-to-know. Further, Boeing and Astro Digital have disclosed this information to each other only subject to mutual non-disclosure provisions.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

This information is not available to the public or third parties.

8. Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

This information is not available to the public or third parties indefinitely.

9. Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:

None