

April 26, 2022

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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Washington, DC 20554

Re: AST&Science, LLC - File No. 1059-EX-CN-2020  
Addendum to Request for Confidential Treatment

Dear Ms. Dortch,

Pursuant to Part 5 and Sections 0.457 and 0.459 of the Federal Communications Commission rules,<sup>1</sup> AST&Science, LLC (“AST”) sought confidential treatment of information submitted in support of the above-captioned experimental license application to protect commercial information and trade secrets.<sup>2</sup> AST files this addendum to its previously submitted request for confidential treatment to provide more specific details to its request as it relates to AST’s submissions regarding orbital debris.

**(1) Identification of specific information for which confidential treatment is sought:** AST seeks confidential treatment of information contained within exhibits related to orbital debris issues, specifically certain component names, the numbers of certain components, the mass of the satellite and certain components, the materials of certain components, and the DAS log information specific to individual components.

**(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:** File No. 1059-EXCN- 2020 (application for experimental license).

**(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret, or is privileged:** Information regarding certain of the components goes to the design of the satellite, and specifically to the methodology of deploying and maintaining the satellite array. This is a unique design that is not used by any other party but is highly sought after. For this reason, the information clearly falls into the definition of commercial information and is also protected trade secrets.

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<sup>1</sup> 47 C.F.R. Part 5 and §§ 0.457 and 0.459.

<sup>2</sup> Letter from Laura A. Stefani, Attorney for AST&Science, to Marlene H. Dortch, Secretary, Federal Communications Commission, ELS File No. 1059-EX-CN-2020 (filed Jan. 14, 2020).

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**(4) Explanation of the degree to which the information concerns a service that is subject to competition:** Some of the frequencies that will be used by the satellite are subject to competitive auction, and therefore related to services subject to competition, but the information sought to be protected by this addendum do not directly relate to a service subject to competition.

**(5) Explanation of how disclosure of the information could result in substantial competitive harm:** AST is developing a novel low-Earth orbit (“LEO”) satellite system that will be unique as the first of its kind to provide direct to off-the-shelf handset communications. Competitors and foreign agents could use information regarding the components used in the BW3 test satellite – and in particular those used to deploy and maintain its unique array - to design similar satellites. This would undermine the investments that AST has made into developing its system.

**(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:** AST ensures protection of this information through nondisclosure agreements (“NDAs”) and confidentiality policies with employees, suppliers, consultants, etc. AST limits what employees and contractors may have access to this protected information. And AST takes care not to disclose this information publicly on its website, in press releases, during interviews, or in any other manner.

**(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:** None of the information for which AST seeks protection is available to third parties other than those subject to NDAs or confidentiality requirements.

**(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:** AST seeks protection of the confidential information indefinitely to ensure that competitors do not receive trade secrets *via* the Commission’s licensing process.

**(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted:** AST is developing a novel satellite technology, the particulars of which could be used by other parties or foreign governments to usurp protected technology and/or to gain a competitive advantage in the marketplace.

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Please direct questions to the undersigned.

Sincerely,

/s/ Laura Stefani  
Laura A. Stefani  
*Counsel for AST&Science*