

3/2/2023

Federal Communications Commission
Office of Engineering
445 12TH ST SW
Washington DC 20554

Confidentiality Request regarding the STA application:
File Number: 0466-EX-ST-2023
Correspondence Reference Number: 75808

Per requirement, this letter lists the answers to the nine questions per CFR 47, Part 0.459(b) on information to be withheld from public inspection. This confidentiality is in reference to the three submitted documents:

1. Exhibit A: USSOCOM Memorandum
2. Exhibit B: Images and Testing Locations and RF Locations
3. Exhibit C: Testing Locations and RF Locations

Purpose for submitting documents is to assist OET to better understand our overall technical design and to meet submittal requirements in providing a technical information of the transmitter unit.

WISER Systems regards this information as commercially sensitive.

In conformity with Section 0.459(b) of the Commission's rules, 47 C.F.R. § 0.459(b), Harris Corporation submits the following:

- 1.) *Identification of the specific Information for which confidential treatment is sought;*
Exhibit A: USSOCOM Memorandum, Exhibit B: Images and Testing Locations and RF Locations, Exhibit C: Testing Locations and RF Locations”
- 2.) *Description of the commission proceedings in which the information was submitted or a description of the circumstances giving rise to submission;*
WISER provided this information to assist in the approval of our OET license application.
- 3.) *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged;*
The description of the WISER system contains confidential, technical and commercial information not made available to the public or competitors. The combination and use of commercial and customized subsystems that make up the WISER system are unique to WISER’s design. Our government sponsor has designated the material Controlled Unclassified Information (CUI).

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

Besides system design and development, we maintain contracts with a number of government and commercial entities. Subsequently, technical and commercially sensitive information regarding our systems could be divulged and abused by competitors resulting in significant financial impact.

5.) *Explanation of how disclosure of the information could result in substantial competitive harm;*

The general information, operational and functional description contain technical data which is monitored and regulated by US Government Rules and Regulations. This data is regulated by the Department of Commerce under Export Administrations Regulations (EAR) or by the State Department under International Traffic in Arms Regulations (ITAR). Violation of these rules and regulations domestic and/or foreign could be detrimental not only to WISER Systems in an unfair manner but also to national security.

6.) *Identification of any measure taken by the submitting party to prevent unauthorized disclosure;*

Documentations in question have been checked marked as confidential during submittal to the online ELS STA application process.

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 data has not been publicly available. It is privileged information available to our government client and any third party affiliates as needed.

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

To prohibit violation of US Government Rules and Regulations and WISER Systems, Proprietary information, specific data should be permanently withheld from public disclosure.

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

Due to the Commission's rules (47 CFR Section 0.459 et seq.) allowing specific material in applications to be kept confidential, these WISER documents outlined above are within the "trade secret and commercial or financial information" category of material that should not be made available for public inspection. 47 CFR, Section 0.457(d).



Sincerely,

A handwritten signature in black ink, appearing to read "Seth Hollar", with a long, sweeping underline.

Seth Hollar, Ph.D.
CTO, WISER Systems, Inc.
919.302.5966
seth.hollar@wisersystems.com