

January 18, 2024

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Request for Confidential Treatment

Dear Ms. Dortch:

AURA Network Systems OpCo, LLC (“AURA”) requests confidential treatment under Section 0.459 of the Commission’s rules¹ for the commercially proprietary and sensitive information contained in the narrative entitled *Request for Experimental License* (“Narrative”) submitted on November 22, 2023, in support of AURA’s application for an experimental license.

In support of this request and pursuant to Section 0.459(b) of the Commission’s rules, AURA states:

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

The information for which confidentiality is being sought (“Information”) appears in the Narrative. The Information consists of commercially sensitive details regarding AURA’s testing of new technology still under development. All non-confidential information contained in the Narrative has been provided publicly in a Reply to Correspondence being filed contemporaneously with this request.

2. Identification of the circumstance giving rise to the submission.

The Information is being submitted to the Commission in connection with an application for an experimental license to test this new technology.

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

The Information contains sensitive, commercial information that is not routinely available for public inspection. Specifically, the Information concerns a new technology that AURA is still developing. The Narrative contains Information that relates to functionality of this new technology and the ways in which AURA is validating the new technology. All aspects of the Information are commercial and are protected as confidential and proprietary.

¹ 47 C.F.R. § 0.459.

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

AURA provides voice and data capabilities to the aviation community, including crewed aircraft and uncrewed aircraft systems (“UAS”), and competes with other service providers that are seeking to develop similarly advanced and innovative platforms and services for the aviation community.

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

Disclosure of the Information would reveal proprietary, non-public information about new technology AURA has under development. Revealing the nature of the testing, or any details related to it, would threaten AURA’s ability to complete our research and development, our ability to create a new product, and our ability to commercialize this new product. This would result in the complete loss of a potential new technology, as well as a great financial loss to AURA.

6. Identification of any measures taken to prevent unauthorized disclosure.

AURA only shares the Information with internal employees and external consultants under the protection of strict non-disclosure agreements, along with employee agreements and commercial contracts that protect AURA’s intellectual property and trade secrets. AURA has not made the Information publicly available because of its proprietary and commercially sensitive nature.

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

The Information is unavailable to the public and has not been disclosed to the public.

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

The Information should remain confidential until AURA causes it to be made public.

To the extent the Commission is unable to grant this request for confidential treatment, AURA requests that the undersigned be contacted immediately.

Respectfully submitted,

_____/s/_____

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