

Reliable Robotics X-band License Application

Confidentiality Request Letter

**Requests that materials or
information submitted to the
Commission be withheld from
public inspection.**

ConfiCFR 47, Part 0.459(b)



1. Overview

This document is intended to satisfy the request for confidentiality as per Correspondence Reference Number 85940 for FCC experimental license application file number 0540-EX-CN-2024.

(b) Except as provided in [§ 0.459\(a\)\(3\)](#), each such request shall contain a statement of the reasons for withholding the materials from inspection (see [§ 0.457](#)) and of the facts upon which those records are based, including:

(1) Identification of the specific information for which confidential treatment is sought;

- The information for which confidential treatment is being sought is the data submitted on page 6 of:

Reliable Robotics
X-band License Application
Operational Details and Environmental Assessment
Form 442 Supplemental Exhibit A

The information is critical, proprietary, and critical to the development of the ACAS-X Radar.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission;

- The information was submitted to the FCC in accordance with FCC Form 442, File Number: 0540-EX-CN-2024

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged;

- The information contained on page 6 of the Form 442 Supplemental Exhibit A relates to the development of a commercial product. The details, as requested, contain results from a body of work leading to the outline of sensitive, proprietary information pertaining to the product development.

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

- The information contained on page 6 of the Form 442 Supplemental Exhibit A relates to the development of a new detect and avoid radar system complying to RTCA DO-166 for autonomous flight. This product will be a commercial product subject to industry competition.

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

- The information contained on page 6 of the Form 442 Supplemental Exhibit A contains information that could be utilized as a system architecture approach for competing radar

systems.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure;

- All documentation relating to the Reliable Robotics ACAS-X Radar is marked as “Confidential and Proprietary” and is maintained on a secure network server.

(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 contained on page 6 of the Form 442 Supplemental Exhibit A is not available to the public. The information has been made available to a single 3rd party vendor with non-disclosure agreements in place.

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

- The initial product development will complete in 24 months. At this time formal FCC licensing will be sought and the information contained on page 6 of the Form 442 Supplemental Exhibit A will no longer be deemed confidential.

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

- The information contained on page 6 of the Form 442 Supplemental Exhibit A is the only portion of the information submitted to the FCC for experimental license that is deemed confidential.