

Starry, Inc.

August 2, 2021

Attention: Application Examiner

RE: Request for Confidentiality

Applicant: Starry, Inc.

FCC ID: 2AGZ3S01411

To Whom It May Concern:

Pursuant to 47 C.F.R. §§ 0.457(d) and 0.459, Starry, Inc. (Starry) hereby requests short-term and long-term confidential treatment, as described below, for certain exhibits submitted in support of Starry's application for certification of the equipment associated with the above-referenced FCC identifier. This equipment represents a unique technological implementation that contains certain intellectual property that would significantly harm Starry if revealed to its competitors or to parties that seek to replicate Starry's equipment.

### **Short-Term Confidentiality**

In order to avoid premature release of sensitive information prior to the marketing and public release of the equipment covered by this equipment certification application, Starry requests that the Commission treat the following exhibits as confidential until 45 days after the date the Grant of Equipment Authorization is issued.

- Test setup photos
- External photos

Disclosure of the exhibits for which Starry seeks short-term confidential treatment during the period of importation and/or distribution would reveal key aspects of proprietary technology to competitors and significantly diminish the value of our investment in research and development.

### **Long-Term Confidentiality**

Starry requests that the Commission treat the following exhibits as permanently confidential:

- Schematics
- Detailed Block Diagrams
- Detailed Operational/Functional Description
- Tune up procedure
- Parts list
- Internal photos
- User Manual

The exhibits for which Starry requests long-term confidential treatment all contain confidential, proprietary technical information that the Commission protects from disclosure as a type of record that is not routinely available for public inspection.<sup>1</sup>

Starry has invested considerable time and materials in research and development to produce the referenced product. To protect its investment, Starry does not release this information in the ordinary course of its business because doing so would result in substantial competitive harm to Starry. Disclosure of these confidential exhibits to competitors would not only give them significant competitive advantages in developing similar

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<sup>1</sup> 47 C.F.R. § 0.457(d).

products, but would also disclose successful implementation of unpublished, leading edge technology developed by Starry and could even reveal information about Starry's unique economic model.

Among the exhibits for which Starry seeks long-term confidential treatment are internal photos. It is appropriate to accord such treatment to the internal photos submitted for two reasons. First, some of these photos are scanning receiving internal photos, which, by rule, the Commission does not make available for inspection.<sup>2</sup> Second, long-term confidential treatment for all other internal photos is also warranted because the referenced product is a non-consumer device that is not sold to end users, nor is it accessible to the general public. These devices are mounted on the top of a large tower or in a locked area, such as a rooftop, and are only serviceable by professional, designated Starry technicians and partners under a Non-Disclosure Agreement (NDA). An example of the NDA between Starry and its technicians and partners is provided herein.

Starry also seeks long-term confidential treatment for the user manual of the referenced product. The manual for this product contains confidential proprietary technical information and is only shared outside the company with professional, designated Starry technicians and partners under an NDA. The manual is not provided to end users because this is a non-consumer device that is not available for sale and end users of the device do not have access to it and cannot service it. Therefore, long-term confidential treatment of the user manual is also warranted.

Sincerely,



Robert M. White  
Senior Director, Product Realization and Mechanical Engineering  
Starry, Inc.

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<sup>2</sup> See 47 C.F.R. § 0.457(d)(1)(ii) ("Portions of applications for equipment certification of scanning receivers and related materials will not be made available for inspection.").