



REQUEST FOR CONFIDENTIALITY

Federal Communications Commission Laboratory Division
7435 Oakland Mills Road
Columbia MD 21046

Date: December 30, 2021

Subject: *Request for Confidentiality FCC File No: 0000177521; 0000177522; 0000177523; 0000177524*

To Whom It May Concern:

My Central Valley, LLC (“MyCV” or “Applicant”), pursuant to 5 U.S.C. § 552 and Sections 0.459 of the Commission’s Rules, hereby requests that the attachments sent to FCC pertaining to its applications for Tolling specified above be treated as confidential and not subject to public inspection. The designated information constitutes confidential and proprietary information that, if subject to public disclosure, would cause significant commercial, economic, and competitive harm. As described below, MyCV’s request satisfies the standards for grant of such requests set forth in Sections 0.459 of the Commission’s Rules.

In accordance with Section 0.459(b) and in support of this request, Applicant provides the following information:

1. Identification of the Information for Which Confidential Treatment is Sought.

Applicant seeks confidential treatment for the following files submitted via email as supporting information of the above Tolling Requests:

“KMYN-LD Tolling Request CONFIDENTIAL Attachments”
“KUMJ Tolling Request CONFIDENTIAL Attachments”
“WRJT-LD Tolling Request CONFIDENTIAL Attachments”
“WZEO_LD Tolling Request CONFIDENTIAL Attachments”

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

The above-referenced files were submitted to the Commission in support of the Tolling Requests submitted on December 20, 2021. These Attachments were filed with the FCC on December 20, 2021 and were filed to disclose the detailed and diligent nature of MyCV’s efforts to complete the construction of the four low-power television construction permits in a timely manner.

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

The information requested to be kept confidential has significant commercial and financial value. The details of the agreements, engineering analyses, processes, equipment specifications and costs provided are subject to non-disclosure agreements between the parties and/or is privileged information.

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

The attachments give light to the strategies of MyCV and its technology partners as well as include confidential and proprietary processes for analysis provided by specialized engineers.

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

Disclosure of this information to the public would result in significant competitive harm to MyCV and its technology partners. Some of the technology that our engineering team and our technology partners have developed for these projects is new and unique to our situation and includes confidential information that provides valuable insight into technology innovations and potential business plans and strategies. Such information could be used by competitors to inhibit vendor relationships and ultimately business expansion efforts. Further, disclosure of this or the remaining information could result in a breach of confidentiality obligations to certain existing vendors causing financial and competitive harm to both parties. Moreover, public disclosure will jeopardize the value of the technologically innovative products under examination by enabling others to develop similar products in a similar timeframe.

6. Identification of any measures taken by the requesting party to prevent unauthorized disclosure.

MyCV has taken steps to keep confidential the information contained in the Attachments to the Tolling Request including limiting the number of people involved in the negotiations of contracts and agreements, as well as the development of equipment and overall strategy of MyCV to only those on a “need to know” basis, and by limiting other external contacts to privileged and confidential communications.

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

The information contained in the Attachments is not available to the public and has only been disclosed to third parties pursuant to the restrictive safeguards described above.

8. Justification of the requested period of confidentiality.

MyCV expects that confidential treatment is necessary for five years beyond the length of the proposed Tolling Period in order to protect its evolving business and technology strategies and to adhere to the confidentiality terms agreed to by the vendors and MyCV.

9. Any other information that would be useful in assessing whether this request should be submitted.

The information subject to this request for confidentiality should not be made available for public disclosure at any time. There is nothing material that public review of this information would add to the Commission’s analysis of MyCV’s request for tolling.

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Moreover, public disclosure of the sensitive information in the Attachments of this application for Tolling *after* the Commission has ruled on the Request for Confidentiality is not necessary for the Commission to fulfill its regulatory responsibilities.

MyCV submits that a grant of confidential treatment as requested would promote continued small business operations as we adhere to our agreements and would thereby serve the public interest. We appreciate your time and your consideration of our official Request for Confidentiality.

Best Wishes,

A handwritten signature in black ink that reads "Roxzan Castro". The signature is written in a cursive style with a large, looping initial 'R'.

Roxzan Castro
COO/Managing Member
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