

August 19, 2026

Via ELS

REQUEST FOR CONFIDENTIAL TREATMENT

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

Re: Zipline International Inc. Application for Special Temporary Authority under Part 5 of the Commission's Rules

Dear Ms. Dortch:

In connection with the attached Application for Special Temporary Authority under Part 5 of the Federal Communications Commission's ("FCC's" or "Commission's") rules ("Application"), Zipline International Inc. ("Zipline") respectfully requests that the FCC withhold from public inspection and grant confidential treatment to the Confidential Technical Exhibit (the "Exhibit") in its entirety.

Zipline is furnishing proprietary, non-public experimental information that it does not make available for public inspection. Pursuant to Section 552(b) of the Freedom of Information Act ("FOIA"),¹ including FOIA Exemption 4 (protecting from disclosure "trade secrets and commercial or financial information"),² and Sections 0.457 and 0.459 of the FCC's rules,³ such information should be withheld from public inspection. This information should not appear for public inspection for the reasons discussed below.

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

Zipline seeks confidential treatment for the Exhibit, which includes specific, sensitive, and proprietary technical information regarding an antenna developed by Zipline for its ultra-wideband ("UWB") ranging system experiment.

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

Zipline is seeking Special Temporary Authority to evaluate the use of a vehicle-to-infrastructure UWB ranging system to support precision positioning for an unmanned aircraft system ("UAS") during

¹ 5 U.S.C. § 552(b).

² 5 U.S.C. § 552(b)(4).

³ 47 C.F.R. §§ 0.457, 0.459.

approach, docking, and departure operations. The Exhibit is being submitted with the STA to provide additional technical details to aid the Commission in its review of Zipline's application.

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

The information subject to this request contains confidential commercial and technical information concerning Zipline's proprietary experimental equipment and test configuration. In particular, the image contains specific, sensitive, and proprietary technical information regarding an antenna developed and implemented by Zipline for its UWB ranging system, including details reflecting the performance of Zipline's particular antenna configuration and system integration.

This information reflects Zipline's non-public research and development activities, product design and engineering work, and testing methodology. Zipline does not make this information available to the public in the ordinary course because it constitutes proprietary developmental and engineering information that derives independent economic value from not being publicly known.

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

Zipline operates in a highly competitive commercial marketplace for autonomous logistics, drone delivery, and related UAS technologies. Zipline directly competes with other drone delivery providers, autonomous aircraft developers, logistics companies, and technology companies developing alternative navigation and positioning solutions.

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

Disclosure of the confidential Exhibit could cause substantial competitive harm to Zipline by revealing non-public details regarding Zipline's experimental equipment and test configuration, including the detailed radiation pattern and performance characteristics of an antenna developed and implemented by Zipline for its UWB ranging system.

Competitors could use this information to gain insight into Zipline's technical approach to vehicle-to-infrastructure UWB ranging, including aspects of its hardware configuration and testing methodology, without making comparable investments in research and development. Because precision positioning capabilities may bear directly on the performance, reliability, and scalability of Zipline's delivery operations, public disclosure would provide competitors with an unfair opportunity to replicate or accelerate competing technical solutions to Zipline's detriment.

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

Zipline routinely treats the information subject to this request as confidential and proprietary and does not disclose it to other parties.

(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 in the image subject to this request is not publicly available and Zipline has not disclosed it to third parties.

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

Zipline requests permanent confidential treatment and non-disclosure of the Exhibit. It is not currently possible to determine any date by which the information in the Exhibit could be disclosed without risk of harm to Zipline.

For the reasons discussed above, Zipline respectfully submits that good cause exists to grant Zipline's narrow request for confidential treatment. Zipline therefore urges the FCC to grant this request and withhold the information from public inspection. To the extent that the FCC disagrees and denies this request, Zipline requests that the enclosed materials be returned to it without consideration, pursuant to Section 0.459(e) of the FCC's Rules.⁴

Enclosed with this application is an unredacted and a redacted version of Exhibit B. Please direct any questions or inquiries regarding this matter to the undersigned.

Respectfully submitted,

/s/ Katy J. Milner

Katy J. Milner

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⁴ *Id.* § 0.459(e).