



Big Beaver Borough
114 Forest Drive
Darlington, PA 16115

Re: Confidential Treatment Of Submitted Plans and Documents

To whom it may concern:

Switch, Ltd, ("Switch") is a technology infrastructure ecosystem company whose core business is the design, construction and operation of the most advanced data centers, which are the foundations of the most powerful technology ecosystems on the planet. Switch believes the future progress of humanity depends on the sustainable growth of the Internet. As more people, businesses, governments and devices come online, the need for data centers increases.

Customers, including governmental agencies, choose Switch because of its security protocols and measures it takes to protect its customers' equipment. Ensuring a secure environment starts with the building engineering and designs of the data centers themselves. Switch has a large security force, incorporates extensive security measures, including biometric scanners and mantraps, and executes extensive non-disclosure agreements with its customers, vendors, and contractors, in furtherance of that security. Given the mission critical nature of Switch's services, as the physical location of the internet, and the high-profile customers and governmental entities Switch supports, Switch is a prime target for terrorism, espionage, sabotage, and other security related attacks. The likelihood of such a security assault increases if information about Switch's engineering plans, processes, materials, technologies, locations, and services are made publicly available. Switch provides extensive layers of security and protocols to protect its facilities, customers' operations, to provide continuity of service and prevent risk of physical or logical attack. Eliminating cyber-security risks and protecting the highly sensitive and confidential information of its customers is of utmost importance to Switch. Disclosure of Switch's building engineering plans, processes, and services directly risks the physical security of Switch's campuses. As such, Switch would suffer irreparable harm, both locally and nationally, if these documents are disclosed publicly.

In addition, the documents to be submitted reflect Switch's significant time and monetary investment in proprietary research, design, and engineering of its data center campuses. Disclosure of the documents would provide competitors, bad actors, foreign adversaries, or others with a roadmap to replicate Switch's proprietary data center design and systems before construction is even completed, and undermine Switch's competitive position in the data center market by exposing design decisions that have not yet been reduced to a publicly observable finished structure. Switch has taken and continues to take reasonable measures to protect the secrecy of its design and



engineering plans, including restricting access on a need-to-know basis, requiring confidentiality agreements from personnel with access to its construction sites and facilities, and affixing confidentiality designations to plans and submissions.

Switch hereby submits certain materials, in unredacted and redacted form, in connection with the above-referenced project (collectively, the "Confidential Materials"). The documents are submitted under confidential cover and redacted pursuant to 65 P.S. § 67.708(b)(2)-(4), (11) and 12 Pa.C.S. §§ 5301-5308, where applicable.

Specifically, the Confidential Materials may include sensitive information relating to facility architecture, security systems and access controls, electrical and mechanical systems, cooling and energy infrastructure, network and communications systems, redundancy and resiliency systems, cybersecurity architecture, operational methodologies, physical security systems, critical infrastructure configurations, and proprietary operational methodologies. Additionally, public disclosure would cause substantial competitive harm, compromise operational and facility security, expose critical infrastructure vulnerabilities, and impair facility safety and system integrity. Switch maintains these materials as confidential through restricted access controls, confidentiality agreements, document markings, limited dissemination, internal security procedures, and document tracking.

Accordingly, Switch respectfully requests confidential treatment to the fullest extent permitted by applicable public-records law, proprietary commercial-information protections, public-safety exemptions, and infrastructure-security provisions.

If any request is received seeking disclosure of these materials, Switch requests prompt written notice before any release to permit assertion of legal remedies, including Attorney General review, court action, injunctive relief, protective orders, or sealing where applicable.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Roberts", with a long horizontal line extending to the right.

Steven Roberts
Vice President of Construction Development