

Exhibit 6
Declaration of Scott Trospen

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ELECTRONIC PRIVACY INFORMATION CENTER)	
Plaintiff,)	
)	
v.)	Case No. 1:10-cv-1992 (ABJ)
)	
THE UNITED STATES DEPARTMENT OF)	
HOMELAND SECURITY,)	
Defendant.)	

DECLARATION OF SCOTT T. TROSPER

I, Scott T. Trospen, hereby declare as follows:

1. I am the Director of Hardware Development Engineering for the ProVision Advanced Imaging Technology (AIT) product line within L-3 Communications Corporation's Security and Detection Systems Division (L-3 SDS). I have a degree in electrical engineering from Texas A&M University and nine years of experience in the AIT product space and an overall 25 years of technology industry experience with the majority of my career working on Radio Frequency (RF) products.
2. As Director of Hardware Development Engineering, I have both an engineering role that exposes me to the technical details of the product and a business role that involves understanding the competitive product space for AIT systems.
3. The AIT market primarily consists of security checkpoints for air transportation applications. This product space is highly competitive based on current and anticipated future product procurements for public transportation security applications. The product procurement activity in the United States is primarily through the Department of

Homeland Security for air transportation applications under the Transportation Security Administration (TSA). A specific example of this procurement activity is the TSA solicitation number: HSTS04-08-R-CT2056 seeking sources for imaging technology systems. Similar air transportation security business opportunities exist and are currently active in Canada, several European countries, Asia and Australia. Competitors to the L-3 SDS ProVision AIT product line include, but are not limited to AS&E, Rapiscan, and Smiths Detection. AIT products from these companies are in production and in specific cases, qualified to the same government performance standards thereby creating a highly competitive business environment.

4. As part of my responsibilities at L-3 SDS and expertise in the RF characteristics of the system, I was asked to review information requested under this Freedom of Information Act (FOIA) inquiry. Specifically these documents include: TSL000029 through TSL000038, TSL000082, excerpts from Underwriters Labs Test results, reference report: E240592-A1-UL-1 and the draft document, "Radiated Emissions and Personnel Health from Safeview's mmWave Holographic Imaging Portals".
5. Selected elements in the reviewed documents pertain to ProVision AIT specific design parameters and functional implementation details of the product developed by L-3 SDS. Disclosure of this information would cause substantial competitive harm as it would enable competitors to copy technical attributes of the design for use in products which would directly compete with L-3 SDS in the AIT product market space. Furthermore, this system and component design information would enable competitors to extract L-3 SDS proprietary system performance metrics and use this information to their advantage in future competitive procurement programs. The documents which include elements as

described above are: TSL000030, TSL000031, TSL000033, TSL000035 and TSL000036. Specifically the redacted information in documents TSL000030, TSL000031, TSL000033 and TSL000035 detail specific system timing parameters which L-3 SDS has developed to optimize the imaging performance of the system. The information redacted in document TSL000036 provides very specific detail on the antenna design L-3 SDS has developed to optimize the imaging performance of the system. The information withheld is information that L-3 SDS would not normally release to the public.

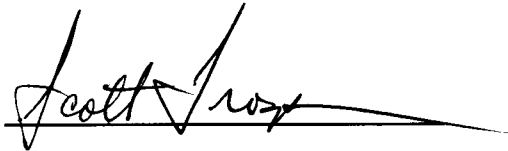
6. The document Bates numbered TSL000082 is a photograph of internal components of the ProVision AIT system and which reveals specific design implementation details that would cause L-3 SDS substantial competitive harm by enabling competitors to copy technical attributes of the design for use in products which would directly compete with L-3 SDS in the AIT product market. The redacted image shows details of the mmWave component placement developed by L-3 SDS to optimize the RF performance and manufacturing cost of the ProVision system. The information withheld is information that L-3 SDS would not normally release to the public.
7. The excerpts from Underwriters Labs Test results, reference report, documents Bates numbered TSL1379-1382, includes ProVision AIT specific design parameters, functional implementation and test methodology details of the ProVision AIT product developed by L-3 SDS. Disclosure of this information would cause substantial competitive harm as it would enable competitors to copy technical attributes of the design for use in products which would directly compete with L-3 SDS in the AIT product market. Specifically the redacted section at document Bates numbered TSL 1380 describes design parameters and component selection related to the motion control sub-system in the ProVision product

line. The information withheld is information that L-3 SDS would not normally release to the public.

8. The draft document "Radiated Emissions and Personnel Health from Safeview's mmWave Holographic Imaging Portals" dated June 18, 2004 is an aggregation of information selected from scientific journals and government agency documents pertaining to health effects of electromagnetic exposure along with early prototype ProVision system electrical operating characteristics. This document was and is labeled both "DRAFT" and "Proprietary". This document was voluntarily produced to the government. The information withheld is information that L-3 SDS would not normally release to the public.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 8 , 2011

A handwritten signature in black ink, appearing to read "Scott Trospen", with a long horizontal line extending to the right from the end of the signature.

Scott T. Trospen