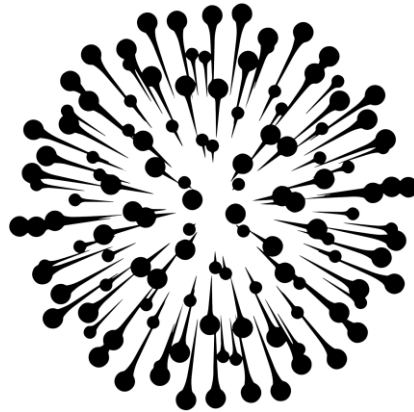


PIXXEL SPACE TECHNOLOGIES, INC.

Amendment - Ground Station Update
FCC Application: 0886-EX-CN-2019

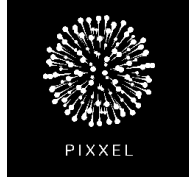


PIXXEL

Pixel Space Technologies, Inc.
3260 Hillview Ave,
Palo Alto, CA 94304

PREPARED BY: Manas Gupta

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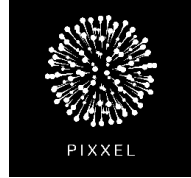


Anand: FCC Application Amendment

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Anand: FCC Application Amendment

1. Purpose and Scope

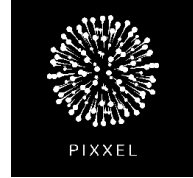
This document is provided as an amendment to Pixxel Space Technologies, Inc. (hereinafter referred to as 'Pixxel')'s granted FCC application (Application number: 0886-EX-CN-2019). The amendment provides an update on the list of ground stations that will be in use for the Data downlink band of Pixxel's Anand mission.

The application is being amended for the following three reasons:

- 1. Include the necessary S-band downlink spectrum requirement that Pixxel has to operate this mission successfully. The previous partial grant (UHF only) license did not authorize this request.**
- 2. Update list of S-band ground stations.**
- 3. Include an S-band downlink interference analysis.**

The application status is highlighted in section 3 and the changes requested in this amendment are highlighted in section 4 of this document. The S-band interference analysis is presented in Appendix A.

Note: Pixxel is actively working with all relevant federal operators to pre-coordinate for their approval of our use of the frequencies specified under section 3 when the satellite is in orbit over ground stations specified in section 4 of this document. In this regard, we have also performed an S-band interference analysis for the relevant ground stations.



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2. Introduction

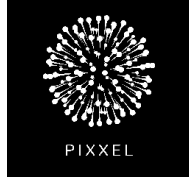
2.1 APPLICANT

Pixxel is a Delaware C-Corporation with its office at 3260 Hillview Avenue, Palo Alto, CA - 94304. Pixxel plans to design, construct, and operate hyperspectral Earth-imaging small satellites.

2.2 MISSION SUMMARY

Anand is a hyperspectral imaging technology demonstration mission, intended to demonstrate Pixxel's capabilities of operating a miniaturized hyperspectral imager on a low-earth orbit (LEO), Small Satellite mission. The mission was scheduled for a June 2020 launch. **As per updates from launch provider, the launch of our mission has moved to March 2021 from previously stated November 2021.**

As stated in the initial application, the satellite mission *Anand* will be launched in a 530 km – 600 km sun-synchronous lower earth orbit with an inclination of 97.8 degrees. To facilitate coordination regarding use of the S-band downlinks, **the operational mission life, involving the use of the S-band downlinks, has been reduced from 3 years to at most one year from launch.** Pixxel will continue to monitor the satellites and conduct TT&C operations for the life of the satellite.



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3. Application Status

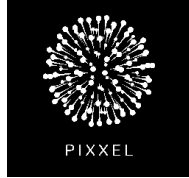
The Anand mission will be operating on the following proposed frequency bands (as outlined in the FCC application mentioned above):

Link Type	Frequency range (MHz)	Required bandwidth (kHz)	Data Rate
Downlink (Telemetry)	401.8974-401.9026	5.2	1200 bps
Uplink (Telecommand)	148.9974-149.0026	5.2	1200 bps
Downlink (Payload)	2242.35-2243.65	1300	2 Mbps

It is to be noted that our experimental license application request was partially granted, with **only the UHF** band being expressly identified and approved on the license grant. For successful operation of our satellite mission, we are also required to use S-band (for the payload downlink) and VHF-band (for the telecommand uplink).¹

¹ Pixxel understands that the FCC does not identify receive frequencies on its experimental license grants. Nonetheless, in an abundance of caution, it is requesting again authority to use the VHF frequencies for uplinks.

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4. Request for Amendment

We are requesting the following changes to our FCC license application in this request for amendment:

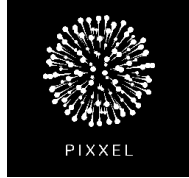
1. Following is the updated list of ground stations:

Ground Station	Location	Latitude [N]	Longitude [E]	Service	Update
<i>IT - 01</i>	<i>Milan - Italy</i>	<i>45.59</i>	<i>9.36</i>	<i>TT&C (VHF, UHF)</i>	<i>Unchanged</i>
<i>IE - 01</i>	<i>Cork - Ireland</i>	<i>51.95</i>	<i>-8.17</i>	<i>Payload Downlink (S-Band)</i>	<i>Unchanged</i>
<i>LT-01</i>	<i>Kaunas - Lithuania</i>	<i>54.91</i>	<i>23.99</i>	<i>Payload Downlink (S-Band)</i>	<i>Removed</i>
<i>ES-01</i>	<i>Puertolla - Spain</i>	<i>38.67</i>	<i>-4.16</i>	<i>Payload Downlink (S-Band)</i>	<i>Removed</i>
<i>EU - 05</i>	<i>Santa Maria - Azores (Portugal)</i>	<i>37.00</i>	<i>-25.14</i>	<i>Payload Downlink (S-Band)</i>	<i>Unchanged</i>
AS - 01	Sri Lanka	7.28	80.73	Payload Downlink (S-Band)	Added
OC- 01	Awarua - New Zealand	-46.53	168.38	Payload Downlink (S-Band)	Added

Note: The ground stations in Lithuania and Spain (stricken through in red) are being replaced by two new stations in Sri Lanka and New Zealand.

2. The mission launch window has moved to March 2021 from previously stated November 2021. The current expected launch date is 20th March 2021.

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APPENDIX A: S-Band Interference Analysis

A.1 Scope of the Interference Analysis

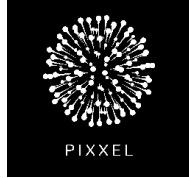
This section contains an International Telecommunication Union (“ITU”) Space Network List (“SNL”) database search associated with the space-to-Earth frequencies in the S-Band being proposed for use and an explanation regarding the mitigation measures Pixxel is undertaking to ensure that its operations will not cause harmful interference.

We note that there are three categories of space systems that apply in our circumstances:

- 1) Those systems with which there is no potential for interference;
- 2) Those systems with which there is some potential for interference; and
- 3) Those systems which have applied to the process as an Advanced Publication Information (“API”) filing and which request the entire frequency band. It is not possible to assess these Category 3 systems at this time because they have not quantified their actual intended operating frequencies.

NOTE: We place these systems in a different category assuming they will not likely be launched or operated during the limited term of our experimental (Part 5) license.

In this section, we will focus on systems only in Category 2 as these systems are the only likely systems that would seem to be capable of any conflict in terms of potential interference.



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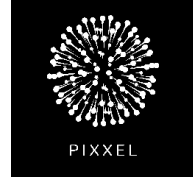
A.2 Summary of the SNL searches

Below is a summary of systems having potential for interference, i.e., falling under category 2 as explained above:

2242.35 to 2243.65 MHz Band Systems;NGSO; Space-Earth links; POTENTIAL CONFLICT:

SNL list for 2242 to 2244 MHz; NGSO; Space-Earth Link; POTENTIAL CONFLICT				
No.	Country	System Name at ITU	NOTIF. REASON	Reason for Potential Conflict
1	CHN	SPPOSS-2-01	A & N	Partial overlap on both TSDN1 and TSDN2 beams
2	CHN	TIANZHOU	N	Overlapping Assignment
3	CHN	2M8M-SAT	A & N	Overlapping Assignment
4	CHN	HJ-1-ABC	N	Slight Overlap
5	CHN	JILIN-1SPW-2	N	Overlapping Assignment
6	CHN	TIANZHI-01	A	Partial overlap on both TSDN1 and TSDN2 beams
7	CHN	HJ-2-AB	A	Partial overlap on the SSD beam
8	F / ESA	ACES	A & N	Partial overlap on the STX beam
9	F	BRONET	A	Overlapping Assignment
10	HOL	HOL-MG-ANS-002	A & N	Overlapping Assignment
11	IND	HSPI	A	Overlapping Assignment
12	NOR	TYVAK-1005	A	Partial Overlap on the SBANDTX band
13	NZL	ELECTRONNZ-3	A	Overlapping Assignment

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14	NZL	PHOTONNZ-2	A	Overlapping Assignment
15	NZL	PHOTONNZ-1	A	Overlapping Assignment
16	USA	P92-1A	A&N	Overlapping Assignment
17	USA	P92-2A	A&N	Overlapping Assignment
NA	USA	PROMETHEUS-B1	A	Overlapping Assignment - as part of coordination discussions with the Air Force, Pixxel understands there is no potential for harmful interference.
NA	USA	PROMETHEUS-B2	A	Overlapping Assignment - as part of coordination discussions with the Air Force, Pixxel understands there is no potential for harmful interference.
Total: 17				

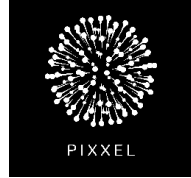
Out of the 185 systems reported under this frequency band, 17 exhibit a possibility of interference. **Of these 17 systems, only 9 systems have been notified.**

- Most of the Chinese satellites are expected to operate outside our coverage area (SPPOSS-2-01, Tianzhou, 2M8M-SAT and HJ-1-ABC). HJ-1-ABC has a 250 kHz overlap. JILIN-1SPW-2 has requested the complete beam.
- We have a spectrum overlap of 1.15 MHz with ACES. At this point of time, we are uncertain about its operations.
- We expect that HOL-MG-ANS-002 will operate using stations falling outside our coverage area.
- We have a spectrum overlap with the P92-1A and P92-1B. At this point of time, we are uncertain about its operations although we are in the process of coordination with the US Air Force.

A.3 Further Coordination and EMC analysis

Regarding the 2242.35 to 2243.65 MHz band, Pixxel agrees to coordinate with affected operators to determine appropriate mitigation measures. Use of this frequency for data transmission purposes will be only during the sunlit period over the four allocated earth stations. Accordingly, we will have data transmission over the proposed link for approximately 8 or fewer passes per day from the total network, and the pass durations are less than or equal to 10 minutes per pass. Additionally, the mission duration is expected to be less than 1 year.

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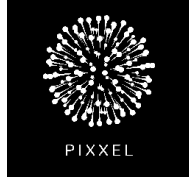
In the event that there is an in-line interference event between systems, which would cause harmful interference, Pixxel would coordinate operationally with the operator of the other system or refrain from transmitting as necessary. We can perform further analysis on systems that could operate co-channel to our own once we have discussed the details of these systems with the appropriate operators. However, given our limited use from one satellite and four ground stations and the low number of potentially affected systems, we believe there is a low probability that Anand would cause harmful interference to other operators.

A complete breakdown of our SNL database search has also been provided as an Appendix for reference.

A.4 VHF Uplink

The telecommand uplink utilizes the Space Operation (Earth-to-Space) allocation spectrum in the 148-149.9 MHz band, consistent with the U.S. and ITU Table of Frequency Allocations. See 47 C.F.R. § 2.106 n. 5.218. Accordingly, we plan on coordinating our use of this band with other authorized operators. We anticipate little to no coordination issues in this spectrum, considering that the IT-01 ground station will be the only station operating at this frequency for telecommand and is based in Italy.

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Appendix B: SNL databases searches

Search query:

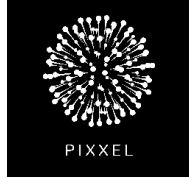
2242 – 2244 MHz; NGSO; space-to-Earth; All Latitudes; All Submission Reasons

ALL ENTRIES:

KEY	
	Category 1 - No potential for interference
	Category 2 - Potential for interference
	Category 3 - Filed API requesting the complete band

ADM/ORG	SATELLITE NAME	NOTIF.REASON	BR IFIC	FREQUENCIES
AFS	ZACUBE-2	A	2875	view
AFS	MDASAT-1	A	2925	view
ALG	ALSAT-1B	A	2811	view
AUS	MNSAT	A	2910	view
B	VCUB1	A	2898	view
BEL	UNICORN-1	A	2843	view
CAN	M3MSAT	A	2723	view
CAN	ADS	A	2724	view

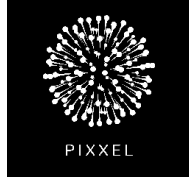
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CAN	NEOSSAT-1A	A	2743	view
CAN	SAPPHIRE	N	2744	view
CAN	GHGSAT-D	A	2773	view
CAN	EV9	A	2784	view
CAN	CANSAT-LEO-S	A	2842	view
CAN	MAPLELEAF-1	A	2844	view
CAN	NORTHSTAR	A	2863	view
CAN	KELYPSIS	A	2884	view
CAN	HOTH	A	2925	view
CHN	COMPASS-H	U	2514	view
CHN	COMPASS-M	U	2514	view
CHN	COMPASS-H	N	2596	view
CHN	COMPASS-M	N	2596	view
CHN	CE-1	N	2646	view
CHN	SHENZHOU	N	2749	view
CHN	NUAA-1	N	2752	view
CHN	SPPOSS-2-01	A	2780	view

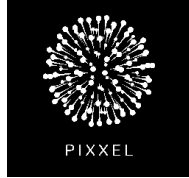
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CHN	COMPASS-MEO	A	2796	view
CHN	TIANZHOU	A	2797	view
CHN	SPACEKEY-1	A	2838	view
CHN	SPPOSS-2-01	N	2841	view
CHN	ZJ-1	A	2843	view
CHN	JILIN-1SPW-1	A	2855	view
CHN	GC-8	A	2858	view
CHN	JILIN-1SPW-2	A	2858	view
CHN	LUNAR CTDRS-1	A	2866	view
CHN	HY-2N	A	2867	view
CHN	DES-LEO	A	2867	view
CHN	GC-9	A	2869	view
CHN	TIANZHOU	N	2874	view
CHN	2M8M-SAT	A	2874	view
CHN	COMPASS-IGSO	U	2876	view
CHN	ACONNECT	A	2878	view
CHN	ACONNECT-T	A	2878	view

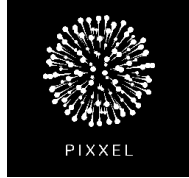
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CHN	SPACEWAY	A	2878	view
CHN	ZHOBT-1	A	2881	view
CHN	ZJ-1	N	2883	view
CHN	HJ-1-ABC	N	2887	view
CHN	JILIN-1SPW-2	N	2888	view
CHN	TIANWANG	N	2890	view
CHN	COMPASS-MEO	N	2891	view
CHN	JILIN-1GPW-1	A	2891	view
CHN	TIANZHI-01	A	2891	view
CHN	SIGNSAT-NGSO	A	2892	view
CHN	XINGYUN-2	A	2897	view
CHN	COMPASS-IGSO	N	2898	view
CHN	JILIN-1GXW-1	A	2898	view
CHN	TSN-1A	A	2898	view
CHN	COMPASS-IGSO	A	2900	view
CHN	HJ-2-AB	A	2900	view
CHN	2M8M-SAT	N	2901	view

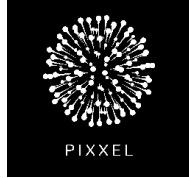
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CHN	TIANGONG	A	2903	view
CHN	HY-2N	N	2909	view
CHN	ACONNECT-B	A	2911	view
CHN	GW	A	2911	view
CHN	C-SAT-LEO	A	2911	view
CHN	DK-1	A	2911	view
CHN	LUNAR CTDRS-1	N	2916	view
CHN	MOTS	A	2917	view
CHN	COMPASS-MEO	U	2918	view
CHN	X-STAR	A	2921	view
CHN	GC-5-02	A	2922	view
CHN	JK-1	A	2922	view
CHN	BEIJING-3	A	2923	view
CYP	LCSC-NET	A	2904	view
D	RAPIDEYE	N	2637	view
D	D-ISIPELE	A	2921	view
D	UNICORN-2	A	2922	view

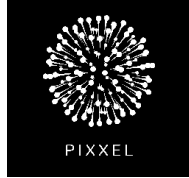
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D	SARAH	A	2923	view
DNK	ULLORIAQ	A	2840	view
DNK	STARLING	A	2891	view
E	AISTECH	A	2896	view
E	3CAT5A	A	2899	view
E	3CAT5B	A	2899	view
F / ESA	SOHO	N	2574	view
F / GLS	MSATNAV-2	N	2588	view
F / GLS	MSATNAV-3	N	2588	view
F / GLS	MSATNAV-4	N	2588	view
F	ASV	A	2778	view
F / ESA	ACES	A	2806	view
F / ESA	ACES	N	2831	view
F	VHR2020	A	2850	view
F / ESA	CLUSTER 1-5	N	2888	view
F	BRONET	A	2891	view
FIN	ICEYE	A	2905	view

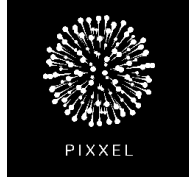
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G	SSG-3D	A	2852	view
G	REMDEB	A	2866	view
G	CATAPULT-IOD	A	2898	view
G	DT1	A	2899	view
G	EN-A2	A	2900	view
G	BEESAT-OC-LS	A	2905	view
G	JUKEBOX	A	2913	view
G	CDCSAT-1	A	2913	view
G	SOAR	A	2915	view
G	FARADAY-1	A	2919	view
G	AAC-AIS	A	2920	view
G	IOMSAT-L1	A	2921	view
HOL	HOL-MG-ANS-002	A	2862	view
HOL	HOL-MG-ANS-002	N	2884	view
HOL	HOL-NGSO1-B-N	A	2917	view
I / GLS	GALILEO-M-NAVSTAR	N	2639	view
I	OPTSAT	A	2833	view

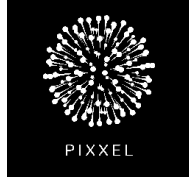
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IND	OCEANSAT-2	A	2671	view
IND	SARAL	A	2772	view
IND	IRS-NEMO-AM	A	2787	view
IND	IRS-NG14	A	2844	view
IND	IRS-SCATSAT-1	A	2849	view
IND	INS-1	A	2855	view
IND	CARTOSAT-2S	A	2863	view
IND	IUSAT-H2	A	2863	view
IND	MICROSAT-TD-1	A	2866	view
IND	LMI	A	2867	view
IND	HYSIS	A	2872	view
IND	HSPI	A	2921	view
IND	CARTOSAT-3	A	2925	view
IRN	DOUSTI	A	2872	view
IRN	ZAFAR	A	2917	view
ISR	NSL-2	A	2868	view
J	ALOS	N	2627	view

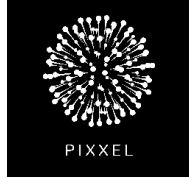
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J	SOCRATES	A	2737	view
J	GRUS	A	2856	view
KOR	KOMPSAT-3-1	A	2924	view
KOR	KOMPSAT-7-1	A	2924	view
LTU	M6P	A	2875	view
LUX	TRITON-X-LIS	A	2905	view
LUX	MINAS	A	2925	view
LVA	VENTA-1	A	2761	view
LVA	VENTA-2	A	2817	view
MRC	MOHAMMED VI - AB	A	2792	view
MRC	MOHAMMED VI - AB	N	2866	view
NOR	NORSAT-1	A	2815	view
NOR	NORSAT-H1	A	2839	view
NOR	HEIMDALL-1	A	2880	view
NOR	TYVAK-1012	A	2888	view
NOR	NORSAT-2	A	2891	view
NOR	TYVAK-1005	A	2920	view

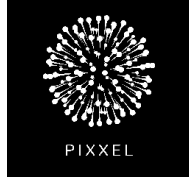
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NOR	TYVAK-182A	A	2923	view
NZL	ELECTRONNZ-3	A	2920	view
NZL	PHOTONNZ-2	A	2923	view
NZL	PHOTONNZ-1	A	2927	view
PAK	PAKTES-1	A	2751	view
PAK	PAKTES-1B	A	2791	view
PAK	PRSS-O1R	A	2865	view
PAK	PAKTES-1	N	2885	view
PNG	MICRONSAT	A	2922	view
POL	SWIATOWID 2	A	2896	view
POL	REC	A	2917	view
RUS	PROGNOZ-N	A	2902	view
RUS	UCTS-ISS	N	2906	view
RUS	RLB	A	2910	view
RUS	PROGNOZ-N	N	2921	view
RUS	SMOTR	A	2922	view
SNG	COLUGO	A	2862	view

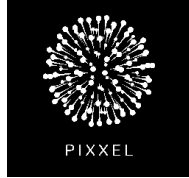
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SUI	ACN	A	2896	view
SVN	NEMO-HD	A	2780	view
SVN	TRISAT	A	2874	view
THA	RTAFSAT	A	2903	view
THA	THAIOT	A	2925	view
UAE	KHALIFASAT	A	2839	view
UAE	SULTAN	A	2923	view
UKR	EAGLE OWL	A	2898	view
UKR	SICH-2M	A	2908	view
USA	P92-1	N	2593	view
USA	P92-2	N	2593	view
USA	PROMETHEUS-B1	A	2806	view
USA	P92-1A	A	2811	view
USA	P92-2A	A	2811	view
USA	PROMETHEUS-B2	A	2854	view
USA	LEMUR-2-3	A	2867	view
USA	P92-1A	N	2875	view

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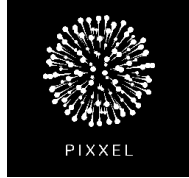
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USA	P92-2A	N	2876	view
USA	USMIG	A	2880	view
USA	USASAT-30G	A	2906	view
USA	EOS PM	A	2924	view
USA	PATHFINDER	A	2924	view
USA	USASAT-30J	A	2925	view
VEN	VRSS-1	N	2742	view
TOTAL:				185

ENTRIES HAVING NO CONFLICT

No.	Notifying Administration	Satellite Name	NOTIF. REASON	Reason for no conflict
1	AFS	MDASAT-1	A	No Common Earth Stations
2	B	VCUB1	A	No Common Earth Stations
3	CAN	SAPPHIRE	N	Transaction Completely Removed

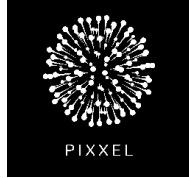
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4	CAN	GHGSAT-D	A	No Common Earth Stations
5	CHN	COMPASS-H	U	Transaction Completely Removed
6	CHN	COMPASS-M	U	Transaction Completely Removed
7	CHN	CE-1	N	Transaction Completely Removed
8	CHN	SHENZHOU	N	Transaction Completely Removed
9	CHN	NUAA-1	N	Transaction Completely Removed
10	CHN	LUNAR CTDRS-1	N	Lunar Mission
11	CHN	ZHOBT-1	A	No common Earth-Stations
12	CHN	ZJ-1	N	No common Earth-Stations
13	CHN	TIANWANG	N	No common Earth-Stations, intersatellite link
14	CHN	TIANGONG	A	No common Earth-Stations
15	D	RAPIDEYE	N	Transaction Completely Removed
16	F / ESA	SOHO	N	Transaction Completely Removed
17	F / GLS	MSATNAV-2	N	Transaction Completely Removed
18	F / GLS	MSATNAV-3	N	Transaction Completely Removed
19	F / GLS	MSATNAV-4	N	Transaction Completely Removed

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20	F / ESA	CLUSTER 1-5	N	No common Earth-Stations
21	G	REMDEB	A	No common Earth-Stations
22	G	DT1	A	No common Earth-Stations
23	I / GLS	GALILEO-M-NAVSTAR	N	Transaction Completely Removed
24	J	ALOS	N	Transaction Completely Removed
25	MRC	MOHAMMED VI - AB	A	No common Earth-Stations
26	NOR	TYVAK-182A	A	No common Earth-Stations
27	PAK	PAKTES-1	N	No common Earth-Stations
28	RUS	UCTS-ISS	N	Only intersatellite communication
29	RUS	RLB	A	Only intersatellite communication
30	UAE	KHALIFASAT	A	No common Earth-Stations
31	USA	P92-1	N	No common Earth-Stations
32	USA	P92-2	N	Transaction Completely Removed
33	VEN	VRSS-1	N	Transaction Completely Removed

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