

Description of Transaction and Request for Waiver

This application requests Commission consent to the transfer of control of experimental licenses held by CPI ASC Signal Division Inc. (“ASC”) (Call Sign WE2XDF) and Radant Technologies, Inc. (“Radant”) (Call Sign KA2XYK).

On July 26, 2017, Odyssey Investment Partners Fund V, LP (“Odyssey”) acquired an indirect controlling interest in CPI International, Inc. (“CPI”) through a merger of a wholly owned subsidiary of Odyssey, with and into a holding company that directly owned 100 percent of CPI. This holding company then merged with and into CPI, with CPI continuing as the surviving entity. CPI indirectly owns 100 percent of ASC and Radant. As a result, these licensees are now indirectly owned and controlled by Odyssey.

Due to inadvertent oversights and misunderstandings regarding FCC licensing requirements, the parties did not file an application seeking consent for the transfer of control of the license. The parties regret the oversight and now seek to rectify the omission by filing this application with a request for a waiver of the requirement in Section 5.79 of the Commission’s rules to seek prior consent to the transfer of control. Another subsidiary of CPI holds a business radio license, and the parties are concurrently filing the appropriate transfer of control application with the Wireless Telecommunications Bureau.

The transaction and grant of consent to these applications are in the public interest. The licenses at issue facilitate the testing of radio communication equipment developed and manufactured by CPI and its affiliates. Commission consent will authorize and support the continued and uninterrupted testing operations enabled by the experimental licenses. Accordingly, the parties respectfully submit that Commission approval for the transaction will serve the public interest, convenience, and necessity.