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August 5, 2026

VIA OET ELS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: File Number: 1502-EX-ST-2026
Request for Special Temporary Authority Experimental Radio License

Dear Ms. Dortch:

On behalf of Aerial Intelligence, Inc. d/b/a/ Halo, please find the attached Public Version of the attached Narrative Discussion, Technical Information, and Supplemental Statements in support of the Request for Special Temporary Authority Experimental License Application identified by the above referenced file number. This application expands upon Halo's Experimental Special Temporary Authorization under Call Sign WA9XVP (File Number 2172-EX-ST-2025), granted by the Commission on April 13, 2026.

Pursuant to 5 U.S.C. § 552 and 47 C.F.R. §§ 0.457, 0.459, Halo respectfully requests that the information attached hereto be treated as confidential and not subject to public inspection. The information and responses within the instant application constitute confidential and privileged information.¹ If the information were subject to public disclosure, it would cause significant commercial, economic, and competitive harm.

Halo requests the following information contained in Exhibits A-B (collectively the "Exhibits") not be routinely available for public inspection:

1. Exhibit A – Narrative Statement

¹ 5 U.S.C. 552(b)(4), 47 C.F.R. § 0.457(d)(1)(ii).

2. Exhibit B – Technical Information, with the exception of the following information necessary to conduct interference mitigation:
 - a. Technical Contact and Stop Buzzer
 - b. Legal Contact Details
 - c. Under “Site A: Las Cruces International Airport (LRU)”: Latitude, Longitude, City, County, State, Zip, Site Elevation, and KMRA Coordinates.
 - d. Under “Antenna Information”: Maximum Flight Altitude
 - e. Under “Radio Information”: Frequency Range (MHz), Radio Output Power (dBm), ERP (dBm) and Emission Designators.
 - f. Under “Remote: Apple iPhone,” “Remote: Google Pixel,” and “Remote: Samsung Galaxy”: Latitude, Longitude, Frequency Range (MHz), Radio Output Power (dBm), ERP (dBm), Emission Designators, and KMRA Coordinates.

1. Identification of the specific information for which confidential treatment is sought.

Halo seeks confidential treatment for the information contained in Exhibits A and B, except for the information outlined above necessary for interference mitigation under Exhibit B. The unredacted version of the Exhibits, as submitted, is labeled as “CONFIDENTIAL.”

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

Halo is filing the enclosed materials in Exhibits A and B in support of its request for a Special Temporary Authority Experimental Radio Service License.

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.

Sections of Exhibits A and B contain and reveal trade secrets and commercial information considered privileged or confidential and are not routinely made for public inspection nor publicly available in the ordinary course of business.

4. Explanation of the degree to which the information concerns a service that is subject to competition.

Sections of Exhibits A and B contain technical specifications related to Halo's proprietary operations of UAS-based wireless communications technology supporting commercial broadband service. This information is subject to vigorous competition from multiple U.S. and non-U.S. third parties.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of sections of the enclosed information in Exhibits A and B would provide valuable insight into Halo's confidential proposed operations, business plans, and strategies, and would cause substantial competitive harm to Halo's market position.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure.

Sections of the enclosed information in Exhibits A and B contain trade secrets and commercial information that are highly confidential. Halo takes significant care to ensure that such information is not released to competitors or to the public, including, but not limited to, hosting all proprietary documentation on encrypted, password-protected services, and requiring non-disclosure agreements prior to the disclosure of any confidential information.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

Sections of the enclosed information in Exhibits A and B are not available to the public and have only been disclosed as necessary to limited third parties, including early-stage investors and partners. Materials are only disclosed via a controlled web portal without download functionality or after a non-disclosure agreement is signed. Furthermore, such third parties may also have claims to assert that the information contained therein is confidential.

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



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Halo requests that the Commission withhold portions of the enclosed information in Exhibits A and B out of public view for an indefinite period of time. Release of this information may cause substantial harm to Halo for the reasons outlined above.

* * *

To the extent the Commission has any questions or concerns, please contact the undersigned.

Cordially yours,

A handwritten signature in black ink, appearing to read "Tim Doughty", with a stylized flourish at the end.

Timothy A. Doughty

EXHIBIT A – NARRATIVE DISCUSSION

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Background

[REDACTED]

[REDACTED]

[REDACTED]

² 47 C.F.R. § 5.61.

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[REDACTED]

[REDACTED]



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EXHIBIT B – TECHNICAL INFORMATION

Applicant Name: Aerial Intelligence, Inc. d/b/a Halo

Applicant FRN: 0037761863

Technical Contact and Stop Buzzer

Name of Contact	John Preis
Email Address	john@halo.one
Telephone Number	323-559-2767
Address	332 Littlefield Ave South San Francisco, CA 94080

Legal Contact Details:

Name of Contact	Tim Doughty
Contact Details	doughty@khlaw.com ; 202.434.4271

Site A: Las Cruces International Airport (LRU)

Latitude	32°18'34.62"N
Longitude	106°54'41.65W
City	Las Cruces
County	Dona Ana County
State	New Mexico
Zip	88007
Site Elevation (m)	1362
KMRA Coordinates (km)	5

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Maximum Flight Altitude (m)	15,240

Radio Information	



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Frequency Range (MHz)	3625
Radio Output Power (dBm)	43
ERP (dBm)	62
Emission Designators	10M0G7D
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Remote: Apple iPhone

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
Latitude, Longitude	Site A: 32°18'34.62" N, 106°54'41.65" W
KMRA Coordinates (km)	1
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
Frequency Range (MHz)	3625
Radio Output Power (dBm)	23
ERP (dBm)	20.8
Emission Designators	5M00G7D
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Remote: Google Pixel

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
Latitude, Longitude	Site A: 32°18'34.62" N, 106°54'41.65" W



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KMRA Coordinates (km)	1
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
Frequency Range (MHz)	3625
Radio Output Power (dBm)	23
ERP (dBm)	20.8
Emission Designators	5M00G7D
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Remote: Samsung Galaxy

Latitude, Longitude	Site A: 32°18'34.62" N, 106°54'41.65" W
KMRA Coordinates (km)	1



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Frequency Range (MHz)	3625	
Radio Output Power (dBm)	23	
ERP (dBm)	20.8	
Emission Designators	5M00G7D	

[illegible][illegible]

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[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	

EXHIBIT C: § 5.63 SUPPLEMENTAL STATEMENTS

- a. If installation and/or operation of the equipment may significantly impact the environment (see § 1.1307 of this chapter) an environmental assessment as defined in § 1.1311 of this chapter must be submitted with the application**

Halo certifies that the installation and operation of equipment for its Experimental STA application will not have a significant impact on the environment as defined under the Commission's rules. Furthermore, the construction of any temporary communications tower, antenna structure, or related facilities authorized by a Commission grant of STA or emergency authorization is not a "federal undertaking" for the purposes of Section 106 review.³ For the purposes of this application, Halo is testing viable frequency bands for its UAS-based solution on a temporary basis, and thus would not be considered a "federal undertaking" and be exempt from historical preservation review under the Commission's rules.

- b. If the applicant requests non-disclosure of proprietary information, requests shall follow the procedures for submission set forth in § 0.459 of this chapter.**

Please see the "Confidentiality Request" in a separate attachment to this application.

- c. (1) For conventional and broadcast experimental radio licenses, each application must include: A narrative statement describing in detail the program of research and experimentation proposed, the specific objectives sought to be accomplished; and how the program of experimentation has a reasonable promise of contribution to the development, extension, or expansion, or use of the radio art, or is along lines not already investigated.**

See narrative in Exhibit A.

³ Appendix C to Part 1, Title 47.