

This exhibit is being filed as a modification to Aeronet's experimental license call sign WJ2XPI, file number 0272-EX-CN-2018, to perform a limited marketing trial in accordance with 47 C.F.R. 5.602.

Aeronet respectfully requests authority to conduct a limited market study in connection with its experimentation in order to evaluate different pricing options as well as demand for its service.

To obtain valid data and present an accurate demonstration of real-world operations, Aeronet requires the ability to deploy its innovative technology in a manner that simulates actual usage. Real world testing will allow Aeronet to evaluate the acceptability of various marketing models and policies. Specifically, Aeronet hopes to examine, among other things, (a) the connectivity profile of cruise ship passengers and crew; (b) how Aeronet's product compares to other on-ship options (e.g., the use and availability of satellite alternatives); (c) service adoption rates; (d) penetration/growth; (e) customer activation costs; (f) usage (for example, during certain times of the voyage, type and frequency, speed maximums and minimums, capacity and usage limitations); (g) pricing; and (h) operational performance and reliability (for example, propagation and interference characteristics, speed, and so forth).

The proposed market trial will be conducted by Aeronet and will not involve the sale of any equipment.

Aeronet will maintain full control of the experimental transmitters and antennas utilized during the trial.

This proposed market trial will be limited to the two cruise ships described in the underlying experimental application. The two ships will operate between Florida and the Bahamas and Aeronet anticipates completing necessary testing by September 1, 2020.

The cruise ships being utilized for this experiment each have a capacity of approximately 1500 passengers. A key part of the marketing trial is to see what the capacity of the Aeronet link is, whether it is adequate to handle all the use cases on the cruise ship, (for passengers, crew, and IoT applications), and how pricing may affect usage patterns and therefore aggregate capacity. Aeronet does not anticipate more than a few hundred passengers using the service at once.

Aeronet intends to provide its service on a wholesale basis and hopes to eventually enable cruise ship operators to provide Aeronet's innovative offering through existing customer connectivity platforms. Aeronet's commercial relationship is with the cruise ship operator, not the end-user consumers, and the cruise ship operator will pay any usage related fees directly to Aeronet.

Accordingly, Aeronet respectfully requests that it be granted authority to conduct market studies as permitted under Section 5.3(k) of the FCC's rules, 47 C.F.R. § 5.3(k) (2014).