

ALL.SPACE Networks, Ltd. (“ALL.SPACE”)

Application for Modification of Experimental License

Narrative Statement

(1) Name, address, phone number (also e-mail address and facsimile number, if available) of the applicant.

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(2) Description of why a modification is needed.

Due to growing interest in ALL.SPACE’s earth station solution, ALL.SPACE is seeking to add the below sites to its existing license, file number: 0651-EX-CN-2025. At all added sites, the ALL.SPACE terminal will communicate with Project Kuiper (Call Sign S3051)¹ in the 28.4 – 29.1 GHz & 29.5 – 30.0 GHz bands.

As with its existing operations, consistent with 47 C.F.R. 25.146(a), ALL.SPACE also certifies that all NGSO operations in the 28.4-28.6 GHz and 29.5-30.0 GHz bands will be in compliance with Article 22, Section II, and Resolution 76 of the ITU Radio Regulations.

Similarly, all operations pursuant in this mod in mobile mode will be temporary and will cover a limited area. All mobile ESIM operations will comply with Section 25.228 of the Commission’s rules for NGSO ESIM earth stations.

Please note that this application is filed while the Commission’s review of the pending transfer-of-control applications involving ALL.SPACE and York remains pending.² ALL.SPACE is a party to those proceedings and anticipates completing the transaction upon receipt of required regulatory approvals.

¹ See Kuiper Systems, LLC, Order and Declaratory Ruling, Call Sign S3051 (granted Jul 30, 2012).

² See, e.g., York Space Systems Inc., Application, ICFS File No. SES-T/C-20260427-01144 at 6-7 (filed May 5, 2026).

ALL.SPACE requests coordinated processing of this application with the pending transfer-of-control applications. Upon grant, consummation should be permitted on the basis that control of ALL.SPACE has been or will be transferred to York pursuant to the Commission's approval. ALL.SPACE will update this Application after consummation to reflect the final ownership structure consistent with the Commission's rules."

(3) Class(es) of station (fixed, mobile, fixed and mobile) and call sign of station (if applicable).

The transmitting antenna(s) will operate as a fixed and mobile satellite earth station. ALL.SPACE seeks authority for both land and maritime authorizations.

(4) Description of the location(s) and geographical coordinates of the proposed operation.

ALL.SPACE is seeking to add the following sites to its existing license:

- Los Angeles, CA
 - Lat: 34° 13' 28" N
 - Long: 118° 29' 58" W
 - Radius of operations: 50 km
- Redmond, WA
 - Lat: 47° 39' 45" N
 - Long: 122° 5' 34" W
 - Radius of operations: 50 km
- Denver, CO
 - Lat: 39° 44' 42" N
 - Long: 105° 0' 31" W
 - Radius of operations: 50 km

ALL.SPACE also requests a minor modification to the center location authorized in Oxnard, CA to: 34° 8' 52", 119° 11' 42"

(5) Transmit equipment to be used, including name of manufacturer, model, and number of units.

ALL.SPACE GEN 2, 20 units

(6) Maximum effective radiated power (ERP) or equivalent isotropically radiated power (EIRP).

For Ka-band, the maximum transmitted EIRP will be 48.5 dBW. The transmitted power is 27.5 Watts. The peak ERP is 43167 Watts.

For all operations, ALL.SPACE will comply with the radiofrequency radiation exposure limits in 47 C.F.R. § 1.1310 and will apply the measures previously articulated in the underlying license application file to ensure compliance.

(7) Emission Designator.

50M0G7D

(8) Overall height of antenna of antenna structure above the ground or an existing structure.

The antenna structure's overall height is less than 6 meters.

(9) Directional Antenna Characteristics.

Width of the antenna beam in degrees at the half-power point	0.6° - 1.8°
Orientation of the antenna in the horizontal plane	0° - 360°
Orientation of the antenna in the vertical plane	10° - 90°