

DESCRIPTION OF TRANSACTION AND PUBLIC INTEREST STATEMENT

Blue Canyon Technologies, Inc. (“**Blue Canyon**” or “**Transferor**”) and Raytheon Technologies Corporation (“**Raytheon**” or “**Transferee**”) respectfully request the consent of the Federal Communications Commission (“**FCC**” or “**Commission**”) for the transfer of control of 3 experimental licenses from Blue Canyon to Raytheon in connection with Raytheon’s proposed acquisition of Blue Canyon. As stated below, the proposed merger will serve the public interest, convenience, and necessity, and the parties respectfully request that the Commission expeditiously grant this application.

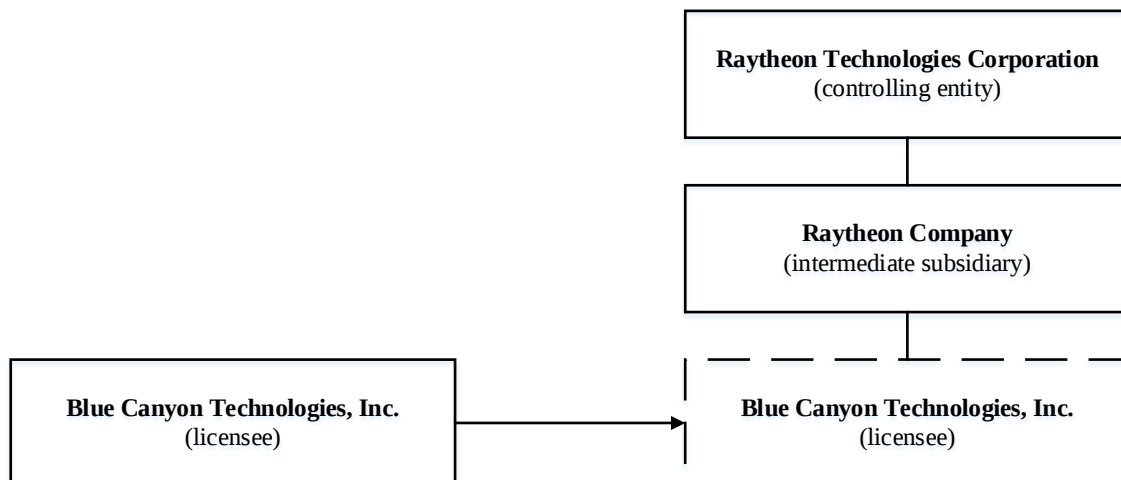
I. THE PARTIES

Blue Canyon Technologies, Inc., incorporated and headquartered in Colorado, is a leading provider of turnkey small satellite solutions, including nanosatellites, microsatellites, and ESPA-class satellites. Blue Canyon supports nearly 50 unique missions with over 90 spacecraft.

Raytheon Technologies Corporation (NYSE: RTX), incorporated in Delaware and headquartered in Massachusetts, is an aerospace and defense company that provides advanced systems and services for commercial, military and government customers worldwide.

II. DESCRIPTION OF TRANSACTION

On November 4, 2020, the parties entered into a definitive agreement in which Raytheon will acquire Blue Canyon in December 2020 or January 2021. Blue Canyon will become a wholly-owned subsidiary of Raytheon Company, which is a wholly-owned subsidiary of Raytheon Technologies Corporation as shown in the diagram below:



III. BLUE CANYON LICENSES AND PENDING APPLICATIONS

Blue Canyon presently has the following experimental licenses as shown in the table below:

FRN	File Number	Call Sign	Applicant Name	Status
0024711335	0640-EX-CR-2019	WJ2XAU	Blue Canyon Technologies	Granted
0024711335	0641-EX-CR-2019	WJ2XCO	Blue Canyon Technologies	Granted
0024711335	0247-EX-CR-2020	WI2XLS	Blue Canyon Technologies	Granted

These licenses support the on-orbit operation of Blue Canyon’s small satellites. Blue Canyon will remain the licensee after the acquisition.

There are no other transfer of control applications being filed with other FCC bureaus.

IV. PUBLIC INTEREST STATEMENT

The parties respectfully request that the Commission grant the applications because the proposed transaction will serve the public interest. Section 310(d) of the Communications Act of 1934, as amended (“**Communications Act**”), states that no transfer of control may take place except upon a finding by the Commission that the public interest, convenience and necessity will be served thereby.”¹ In making this determination, the Commission must first assess whether the proposed transaction complies with the specific provisions of the Communications Act, other applicable statutes, and the Commission’s rules.² If the proposed transaction does not violate a statute or rule, then the Commission considers whether the transaction could adversely impact the public interest by substantially frustrating or impairing the objectives or implementation of the Act or related statutes.³

Each party has the requisite “citizenship, character, financial, technical, and other qualifications” to hold Commission licenses.⁴ Each party is a U.S. corporation with strong financial performance records and collectively have the legal and technical expertise to ensure compliance with Commission regulations. Consenting to the transfer of control of licenses will serve the public interest, convenience, and necessity by enabling Raytheon to continue to utilize radiofrequency spectrum for its product development.

V. OMITTED, PENDING, AND AFTER-ACQUIRED LICENSES

The parties request that Commission approval of the transfer of control application also

¹ 47 U.S.C. §310(d).

² *Application of AT&T Mobility Spectrum LLC and FiberTower Corporation for Consent to Transfer Control of 39 GHz Licenses*, Memorandum Opinion and Order, 33 FCC Rcd 1251, 1253, ¶7 (2018) (*AT&T-FiberTower Order*); *Applications of Level 3 Communications, Inc. and CenturyLink, Inc. for Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, 32 FCC Rcd 9581, 9585, ¶8 (2017) (*L3-CenturyLink Order*).

³ *AT&T-FiberTower Order*, 33 FCC Rcd at 1253, ¶7; *L3-CenturyLink Order*, 32 FCC Rcd at 9585, ¶9.

⁴ See 47 U.S.C. §310(d) (citing the requirements of 47 U.S.C. §308); *AT&T-FiberTower Order*, 33 FCC Rcd at 1255-56, ¶11.

includes (i) any applications or licenses that were inadvertently omitted and (ii) any applications or licenses filed or granted during the pendency of the transfer application and prior to the notification of consummation of the acquisition. This request is consistent with Commission practice.⁵

VI. CONCLUSION

For the foregoing reasons, the parties respectfully request that the Commission grant the application for transfer of control.

⁵ See *Applications of Cricket License Company, LLC, et al., Leap Wireless International Inc., and AT&T Inc. for Consent to Transfer Control of Authorizations*, Memorandum Opinion and Order, 29 FCC Rcd 2735, 2809, ¶191 (2014); *Applications of AT&T Wireless Services, Inc. and Cingular Wireless Corp. for Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, 19 FCC Rcd 21522, 21626, ¶275 (2004).