

DESCRIPTION OF TRANSACTION AND PUBLIC INTEREST STATEMENT

HRL Laboratories LLC (“Licensee,” “Transferor”, or “HRL”), a Delaware limited liability company, and International Business Machines Corporation (“Transferee” or “IBM”), a New York corporation (collectively, the “Applicants”), submit the foregoing application (the “Application”) for the Federal Communications Commission’s (“FCC” or “Commission”) consent to the transfer of control of Licensee’s two Experimental Radio Station Construction licenses (Call Sign WA3XAR and Call Sign WA3XDV). In addition to this Application, the Applicants are applying to the FCC Wireless Telecommunications Bureau for the FCC’s consent to transfer of control of Licensee’s non-common carrier Industrial/Business Pool (IG) license (Call Sign WRMX245, application number 0012152550). Other than that, the Applicants are not requesting any other action from any FCC bureau or office.

Pre-Transaction Ownership Description

Licensee is a research and development institution that delivers transformative technologies in automotive, aerospace, and defense.

Licensee is owned jointly by The Boeing Company (“Boeing”), a Delaware corporation, and General Motors Holdings LLC (“GM”), a Delaware limited liability company. Boeing is a leading aerospace company that develops, manufactures, and services commercial airplanes, defense products, and space systems. GM is a leading automotive manufacturer.

Transferee is a leading provider of global hybrid cloud and AI, and consulting expertise.

Description of the Transaction and Public Interest Statement

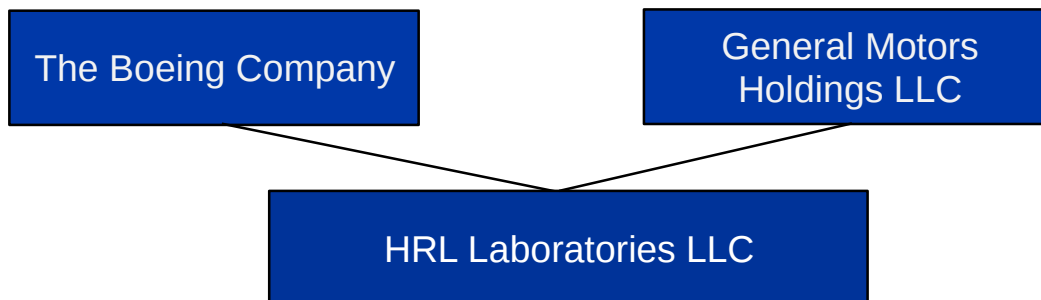
On July 21, 2026, IBM, HRL, Boeing, and GM entered into an Equity Purchase Agreement, pursuant to which IBM has agreed to acquire HRL. Upon the closing of such transaction, Licensee will operate under the ownership and control of IBM. Diagrams depicting HRL’s pre- and post-transaction ownership are depicted on Page 2 below.

Pursuant to Section 310(d) of the Communications Act, the Commission will approve a proposed transaction if it concludes that, after balancing the potential benefits and harms, doing so would serve the public interest, convenience, and necessity.¹ This transaction easily satisfies this standard. HRL, under the ownership and control of IBM, will continue to utilize the license in accordance with the terms of the FCC’s license.

¹ 47 U.S.C. § 310(d).

HRL Laboratories LLC (Licensee and Transferor)
International Business Machines Corporation (Transferee)
FCC Form 703

HRL's Pre-Transaction Organizational Structure



HRL's Post-Transaction Organizational Structure

