

Attachment D

ITU Cost Recovery Letter



K2 Space Corporation
1355 Sepulveda Blvd
Torrance CA 90501

4 September 2026

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Subject: ITU Cost Recovery Declaration for the SES Pathfinder 2 Satellite Network Operating in Non-geostationary Orbit in Non-planned Frequency Bands.

Reference: FCC Application ELS File No. 0962-EX-CN-2026

Dear Ms. Dortch,

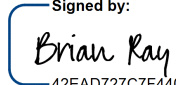
K2 Space Corporation is aware that, in accordance with Resolution 88 of the International Telecommunication Union's (ITU) Plenipotentiary Conference (Marrakech, 2002), and ITU Council Decision 482, as modified, cost-recovery fees will apply to satellite network filings received by the Radiocommunications Bureau after November 7, 1998. Consequently, FCC applicants are responsible for any and all fees charged by the ITU to process applicants' satellite network filings.

K2 Space Corporation hereby states that it is aware of this requirement and unconditionally accepts all cost recovery responsibilities associated with the ITU filings for the SES Pathfinder 2 satellite network. Please address all cost-recovery inquiries, and ITU correspondence and filings, related to the SES Pathfinder 2 satellite network to the following point of contact. We understand that should there be any change in the point of contact information, we will inform the FCC within 30 days of any such change.

Point of Contact Name: Brian Ray
Organization Name: K2 Space Corporation
Address: 1355 Sepulveda Boulevard, Torrance, CA 90501
E-Mail: brian@k2space.com
Telephone Number: +1 240-385-2216

K2 Space Corporation understands that it must remit payment of any resultant cost-recovery fees to the ITU by the due date specified in the ITU invoice, unless an appeal filed prior to the due date is pending with the ITU. K2 Space Corporation further fully understands that a license granted in reliance on such a commitment will be conditioned upon discharge of any such cost-recovery obligation, and acknowledges that, in accordance with 47 C.F.R. §25.111, should we have an overdue ITU cost-recovery fee and have no appeal pending with the ITU, the FCC may dismiss any application associated with that satellite network.

Sincerely,

Signed by:

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Brian Ray
General Counsel
K2 Space Corporation