

EXHIBIT B

Request for Waiver of 47 CFR Section 5.115

Station Identification Requirement

FCC Form 442 - Item 11

File No.: 0809-EX-CN-2026

Applicant: Regulus Cyber, Inc.

Application: New Conventional Experimental Radio License, 47 CFR Part 5

1. Request

Pursuant to 47 CFR Section 1.3 and Section 5.59, Regulus Cyber, Inc. respectfully requests a waiver of the station identification requirement set forth in 47 CFR Section 5.115 for the equipment described in Item 10 of the accompanying FCC Form 442 application. Specifically, waiver is requested from the requirement to transmit station identification on the frequencies authorized under this application.

2. Basis for Waiver

The Commission's rules permit waiver of any provision of Part 5 where "good cause" is shown. Good cause exists here on both technical and mission-effectiveness grounds, as detailed below.

2.1 Technical Impossibility of Compliant Station Identification

The two transmitting subsystems described in Item 10 - the GNSS EW Module and the RF Effector - operate on fundamentally different signal paradigms than conventional communications systems. Both subsystems are designed to produce electromagnetic emissions whose specific waveform structure is inseparable from their designed function:

- The GNSS EW Module produces waveforms that emulate multi-constellation Global Navigation Satellite System signal structures on non-GPS frequencies. Insertion of a distinguishable Morse-code, voice, or digital station identification into the emitted waveform would either (a) render the signal ineffective for its designed purpose, or (b) create a distinguishable feature that could be exploited by adversary UAS platforms to reject the technique. Either outcome would defeat the operational purpose for which the FCC experimental authorization is being sought.
- The RF Effector produces wideband continuous-wave swept emissions that occupy 55 MHz of instantaneous bandwidth per band. The emission is not modulated with information content in the conventional sense; it is a broadband RF energy waveform whose defining feature is its spectral flatness across the swept range. Insertion of a station identification component would necessarily create spectral non-uniformity that would (a) reduce the effectiveness of the emission for its

designed purpose, and (b) potentially concentrate transmit energy at specific frequencies in a manner inconsistent with the applicant's interference-minimization design.

In both cases, station identification as contemplated by Section 5.115 is technically incompatible with the emission itself. The requirement cannot be met without defeating the purpose of the authorization.

2.2 Alternative Identification Mechanisms

While technical station identification transmission is not feasible, the applicant proposes and commits to the following alternative identification mechanisms that will provide functionally-equivalent traceability of emissions to the authorized licensee:

(a) Advance Notification.

Prior to each period of operation, the applicant will provide written notification to the installation spectrum management office, the cognizant federal spectrum manager, and (where applicable) the FAA regional coordinator, identifying the specific date, time, duration, frequency, and geographic area of planned operation. Notification records will be retained for the duration of the license period plus five (5) years, and made available to the Commission upon request.

(b) Physical Equipment Marking.

Each Ring5 unit operated under this authorization will bear a permanent, visible marking identifying the applicant as Regulus Cyber, Inc., the FCC file number, and a serial number unique to that unit. Markings will be affixed on the primary equipment enclosure in accordance with commercial-industry practice for portable radio equipment.

(c) Operator Records.

The applicant will maintain a log of all activations of each Ring5 unit, including date, time, operator identity, deployment location, frequencies used, and duration of transmission. Logs will be retained for the license period plus five (5) years.

(d) Geographic Containment.

All operations will be conducted exclusively at U.S. federal military installations, DoD training ranges, and DHS facilities, providing inherent traceability of the emission source through the installation's access control and mission-authorization processes.

2.3 Precedent for Similar Waivers

The Commission has previously granted waivers of Section 5.115 for experimental licenses covering counter-UAS, electronic warfare research, and other applications in which station identification is technically incompatible with the licensed emission. These waivers have consistently been granted on the basis of (a) technical impossibility of compliant identification, (b) alternative traceability mechanisms, and (c) limited geographic scope. All three grounds apply in the present case.

2.4 No Public Interest Harm

Grant of the requested waiver will not harm the public interest. Section 5.115 exists to enable the Commission to trace emissions to their source in the event of interference or complaints. Under the alternative mechanisms proposed above, and given the limitation of operations to federal installations under prior coordination, the Commission's ability to trace emissions to the applicant is preserved and arguably enhanced relative to conventional Morse-code identification, which would be difficult to detect and decode from a wideband swept emission in any event.

3. Requested Relief

The applicant respectfully requests that the Commission grant a waiver of 47 CFR Section 5.115 for the duration of the experimental license, subject to the applicant's compliance with the alternative identification mechanisms described in Section 2.2 above. The applicant is prepared to accept as a license condition any specific record-keeping, notification, or physical-marking requirements the Commission deems appropriate to preserve the public-interest purpose of Section 5.115.

- End of Exhibit B -