

EXHIBIT A

Waiver Requests

The Commission may waive any of its rules if there is “good cause” to do so.¹ In general, waiver is appropriate if (1) special circumstances warrant a deviation from the general rule; and (2) such deviation would better serve the public interest than would strict adherence to the rule.² Generally, the Commission will grant a waiver of its rules in a particular case if the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest.³ PlanetiQ submits that good cause exists to waive the following rules.

PlantiQ requests waiver of the U.S. Table of Frequency Allocations to conduct RO soundings of GNSS signals. Similarly, the company requests waiver of any FCC requirement to provide information about the GLONASS and BeiDou systems or request U.S. market access for those systems⁴. Fundamentally, PlanetiQ is not seeking access to the two systems for the reception of the specific transmitted GNSS data or the provision of or use of the systems for GNSS. Rather, PlanetiQ is conducting RO soundings based on the presence of the GNSS signals to measure the amount of diffraction of the signals in the atmosphere for weather analysis purposes, as discussed above.⁵ Moreover, PlanetiQ has no information about the GLONASS and

¹ See 47 C.F.R. § 1.3; *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

² See *Northeast Cellular*, 897 F.2d at 1166.

³ See *WAIT Radio*, 418 F.2d at 1157.

⁴ The GPS and Galileo systems are permitted to provide GNSS service to the United States. See, e.g., Waiver of Part 25 Licensing Requirements for Receive-Only Earth Stations Operating with the Galileo Radionavigation-Satellite Service, Order, 33 FCC Rcd 11322 (2018).

⁵ See also Technical Annex at § 2.1 (providing additional explanation regarding RO analysis). This use is analogous to the sensing of radiofrequency signals. See, e.g., Stamp Grant, HawkEye

BeiDou systems that is not publicly available. The company has no relationship with the operators of those systems and would be unable to obtain any additional information.⁶

Additionally, as discussed above, the sale of RO data is in furtherance of legislative mandates to improve U.S. weather forecasting capabilities and enhance the viability of using commercial RO data to support the federal government's weather forecasting mission. For these reasons, waiver of any FCC requirement necessary to conduct RO soundings of any GNSS signals is warranted.⁷

360 Inc., ICFS File No. SAT-LOA-20190102-00001 (granted in part Dec. 10, 2019) (authorizing the sensing of radio frequency signals).

⁶ Also, with respect to prior GNOMES spacecraft, the FCC has not required PlanetiQ to provide any such information or to seek U.S. market access for the GLONASS and BeiDou systems. *See, e.g.*, Grant, ELS File No. 0504-EX-CN-2020 (granted November 6, 2020); Grant, ELS File No. 0734-EX-CN-2021 (granted March 2, 2022).

⁷ *See, e.g.*, GNOMES-4 Grant at Condition 9 (approving the same use for GNOMES-4); Stamp Grant, Loft Orbital Solutions, Inc., ICFS File No. SAT-LOA-20240517-00107, Call Sign S3199, at Conditions 4-5 (granted April 28, 2025).