

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Oligo Space	)	Call Sign: _____
	)	
Application for Authority to Launch and	)	File Number: SAT-LOA-2026 _____
Operate a Non-Geostationary Orbit Satellite	)	
in the Earth Exploration Satellite Service	)	
Operating in the 2025-2110 MHz, 2200-2290	)	
MHz and 8025-8400 MHz, and	)	
1616-1626.5 MHz Frequency Bands	)	
	)	

Application

Nathan Johnson
Adriane Mandakunis
Aegis Space Law
+1 (832) 677-4854
Counsel for Oligo Space

Corey Mack
Head of Operations
Oligo Space
3457 W El Sgundo Blvd
Suite C
Hawthorne, CA 90250
+1 (310) 529-2006

Dated: August 12, 2026

Table of Contents

I.	Introduction	4
II.	Frequency Plan.....	5
A.	2025-2110 MHz	6
B.	2200-2290 MHz	7
C.	8025-8400 MHz	7
D.	1616 – 1626.5 MHz.....	8
E.	Spectrum Sharing Capabilities	8
III.	SMALL SATELLITE CERTIFICATIONS	9
IV.	PUBLIC INTEREST STATEMENT	10
V.	WAIVER REQUEST	11
A.	Section 2.106 - Table of Allocations.....	11
a.	2025-2110 MHz.....	12
b.	2200-2290 MHz.....	13
c.	8025-8400 MHz.....	14
d.	1616–1626.5 MHz.....	16
VI.	Antenna Gain Contours	17
VII.	ITU AND OWNERSHIP REQUIREMENTS	18
A.	ITU Requirements.....	18
B.	Ownership Information.....	18
VIII.	Conclusion	18

Attachment A - ITU Cost Recovery Letter

Attachment B - Oligo Space Ownership Information

Attachment C - List and Description of Onboard Payloads

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	)
Oligo Space	)	Call Sign: _____
	)	)
Application for Authority to Launch and	)	File Number: SAT-LOA-2026 _____
Operate a Non-Geostationary Orbit Satellite	)	
in the Earth Exploration Satellite Service	)	
Operating in the 2025-2110 MHz, 2200-2290	)	
MHz and 8025-8400 MHz, and	)	
1616-1626.5 MHz Frequency Bands	)	
	)	

Application

I. Introduction

Oligo Space (“Oligo”)¹ requests authority to launch and operate one non-geostationary orbit (“NGSO”) satellite, Chimera-1, pursuant to the Federal Communications Commission’s (“Commission”) streamlined licensing procedures for small satellites.²

Chimera-1 is a low-Earth orbit hosted-payload spacecraft designed to support technology demonstration, spacecraft subsystem validation, and space research activities for commercial and academic payload customers. The mission will demonstrate Oligo’s Chimera satellite bus and hosted payload platform while enabling customers to evaluate sensors, communications technologies, propulsion systems, radiation mitigation technologies, and scientific payloads in the space environment.³

¹ Oligo is a U.S. company incorporated in Delaware.

² See 47 C.F.R. § 25.122; *see also Streamlining Licensing Procedures for Small Satellites*, Report and Order, 34 FCC Rcd 13077 (2019) (“Smallsat R&O”).

³ Oligo has provided a list of onboard payloads in Attachment C.

The Chimera-1 satellite will be deployed into a 510 ± 10 km sun-synchronous orbit with an inclination of 98.7° for a mission duration not to exceed five years. Chimera-1 is scheduled to launch on a SpaceX Transporter rideshare mission no earlier than April 2027. Accordingly, Oligo requests that the license be granted by January 1, 2027, to ensure sufficient time to complete integration of Chimera-1 on board the launch vehicle.

II. Frequency Plan

Oligo requests authority to conduct telemetry, tracking, command (“TT&C”), payload support, and payload data downlink operations using the 2025-2110 MHz, 2200-2290 MHz, 8025-8400 MHz, and 1616-1626.5 MHz frequency bands, subject to the waiver requests described herein.

The following table summarizes the proposed frequency plan for the Chimera-1 mission.

Frequency Band (Center Frequency)	Link Direction	Purpose
2025-2110 MHz (2070 MHz, 2035 MHz (backup))	Earth-to-space	Command uplink Payload uplink
2200-2290 MHz (2245 MHz)	Space-to-Earth	Telemetry downlink Payload downlink
8025-8400 MHz (8200 MHz)	Space-to-Earth	Payload downlink
1618.725-1626.5 MHz (1622.4375 MHz)	Space-to-space (transmit & receive)	TT&C uplink TT&C downlink

Table 1: Chimera-1 Frequency Band Plan

Although Chimera-1 operations are technically consistent with many operational characteristics associated with Space Operations Service (“SOS”) and Space Research Service

(“SRS”)⁴ systems, certain proposed operations are not fully conforming under the United States Table of Frequency Allocations. Accordingly, Oligo requests limited waivers described herein to permit low-duty-cycle hosted payload, TT&C, and payload support operations while protecting incumbent Federal and non-Federal operators through coordination, operational constraints, and compliance with applicable ITU power flux-density limitations.

Chimera-1 will operate pursuant to the SRS allocations in the 2025-2110 MHz and 2200-2290 MHz bands (collectively, the “S-band”). It will also seek to operate in the 8025-8400 MHz band (“X-band”) on a non-conforming basis. Chimera-1 will utilize Mobile Satellite Service (“MSS”) spectrum in the 1616-1626.5 MHz band through the Iridium satellite network. Oligo requests waivers of the table of allocations and the Commission’s rules for operations in these bands.

In the 2200-2290 MHz band (“S-band downlink”), Chimera-1 will transmit telemetry and payload data to its ground station network outside of the United States to test satellite functionality, monitor satellite health, and ensure safe space operations. Chimera-1 will also transmit payload data to Earth.

In the 2025-2110 MHz band (“S-band uplink”), Oligo will transmit commands to Chimera-1 to test satellite functionality, monitor satellite health, and ensure safe space operations. Chimera-1 will also receive payload data from its earth station network.

A. 2025-2110 MHz

⁴ The ITU defines SRS as “a radiocommunication service where spacecraft or other objects in space are used for scientific or technological research purposes.” *See, e.g.*, ITU Radio Regulation Definitions.

The S-band uplink hosts a primary Space Operations Service (“SOS”) allocation (Earth-to-space) and an Earth Exploration Space Services (“EESS”) allocation (Earth-to-space) in both the International and U.S. Tables of Frequency Allocations.⁵ Some of Chimera-1’s proposed operations meet this service allocation definition as described in section I.

Oligo seeks a waiver below to utilize this band to uplink data and other information related to the performance of its onboard computer. As discussed below, the technical operation of this channel for command or payload signals will not be meaningfully distinct.

Oligo will comply with applicable ITU rules and complete any necessary coordination with the Federal operators. This limited use will not exclude other operators from use of these bands. The Commission has previously recognized that SOS and EESS spectrum can accommodate both commercial and Federal small satellite operations on a non-exclusive basis.⁶

B. 2200-2290 MHz

Oligo requests to use the 2200-2290 MHz bands for TT&C and payload downlinks, consistent with the primary SOS and SRS allocations (space-to-Earth) in the International Table of Frequency Allocations.⁷ Oligo’s data payload downlinks will feature identical frequency characteristics to its Command downlink transmissions. Oligo will comply with applicable ITU rules and complete any necessary coordination with the Federal operators. Oligo seeks a waiver as detailed in Section IV below for authority to use this band exclusively outside the United States.

C. 8025-8400 MHz

⁵ See 47 C.F.R. § 2.106.

⁶ See Streamlined Processing Order ¶ 107. Sharing frequencies under the streamlined process is possible when operators can “effectively schedule” or coordinate their activities, which are limited in number and of the transmissions, so that future entrants can be accommodated. See *id.* ¶¶ 81, 107.

⁷ See 47 C.F.R. § 2.106.

The 8025-8400 MHz band is allocated to EESS (space-to-Earth) in all ITU regions and within the United States. For the Chimera-1 mission, the 8025-8400 MHz band will be used exclusively for downlinking payload data and TT&C functions. Although Oligo proposed operations do not conform with the table of allocations, they are technically capable of protecting existing and future X-band users. Specifically, Oligo seeks authority for hosted payload support and TT&C operations that do not fall within the existing U.S. allocation framework for EESS operations in this band.

Further details on measures to protect Federal and commercial X-band operators are provided in Oligo's waiver request below. Oligo will comply with applicable ITU rules and recommendations and complete any necessary coordination with the Federal operators. Accordingly, this limited use will not exclude Federal and non-Federal operators from use of this band.

D. 1616 – 1626.5 MHz

The 1616–1626.5 MHz band is allocated on a primary basis to the Mobile Satellite Service (“MSS”) for communications between mobile earth stations and non-Federal space stations. Chimera-1 will incorporate a commercially available, Iridium-compatible modem that will function as a user terminal within the Iridium MSS network, to support telemetry, tracking, and command (“TT&C”) functions.

All communications in this band will occur exclusively between Chimera-1 and Iridium-authorized space stations using frequencies, waveforms, and protocols assigned and controlled by Iridium. Chimera-1 will not independently select operating frequencies in this band and will not transmit outside of the parameters authorized by Iridium.

E. Spectrum Sharing Capabilities

The Chimera-1 antenna is a half-duplex transceiver, meaning that it will not be able to transmit and receive at the same time. This will limit Chimera-1's spectrum footprint when it is communicating with its ground station network, facilitating coordination and minimizing the potential for harmful interference to existing commercial and government users in the band.

In addition to the one-directional traffic when Chimera-1 is either transmitting or receiving, Chimera-1 will only transmit for brief periods of time when it passes over its ground station network. When not in communication with a ground station, Chimera-1 will not be transmitting and therefore poses no potential for harmful interference.

III.SMALL SATELLITE CERTIFICATIONS

Oligo hereby certifies that it complies with the Commission's streamlined requirements for small satellites.

Streamlined Rules Requirements⁸	Oligo Certifications
(1) The space station(s) will operate only in non-geostationary orbit.	Chimera-1 will operate in non-geostationary orbit as described above and in its Technical Annex.
(2) The total in-orbit lifetime for any individual space station will be six years or less.	Chimera-1 will be in orbit for no longer than five years.
(3) The space station(s): (i) Will be deployed at an orbital altitude of 600 kilometers or below; or (ii) Will maintain a propulsion system and have the ability to make collision avoidance and deorbit maneuvers using propulsion.	Chimera-1 will be deployed at an altitude of no more than 520 km.
(4) Each space station will be identifiable by a unique signal-based telemetry marker	Chimera-1 will have a unique transmitting telemetry channel, allowing it to be

⁸ See 47 C.F.R. 25.122.

distinguishing it from other space stations or space objects.	identifiable during commissioning and in-orbit activities.
(5) The space station(s) will release no operational debris.	Chimera-1 will not release any operational debris.
(6) The space station operator has assessed and limited the probability of accidental explosions, including those resulting from the conversion of energy sources on board the space station(s) into energy that fragments the spacecraft.	Oligo has assessed and limited the probability of accidental explosions.
(7) The probability of a collision between each space station and any other large object (10 centimeters or larger) during the orbital lifetime of the space station is 0.001 or less as calculated using current NASA software or other higher fidelity model.	The probability of collision between Chimera-1 and other large objects is $9.22E-4$, well below the Commission's threshold.
(8) The space station(s) will be disposed of post mission through atmospheric re-entry. The probability of human casualty from portions of the spacecraft surviving re-entry and reaching the surface of the Earth is zero as calculated using current NASA software or higher fidelity models.	The probability of human casualty due to the disposal of Chimera-1 through atmospheric re-entry is zero.
(9) Operation of the space station(s) will be compatible with existing operations in the authorized frequency band(s). Operations will not materially constrain future space station entrants from using the authorized frequency band(s).	Chimera-1 will be compatible with existing operations due to sporadic and narrow use of the band, coordinated by Oligo's ground-station-as-a-service partner.
(10) The space station(s) can be commanded by command originating from the ground to immediately cease transmissions and the licensee will have the capability to eliminate harmful interference when required under the terms of the license or other applicable regulations.	Chimera-1 can be commanded by command originating from the ground to immediately cease transmissions and Oligo will have the capability to eliminate harmful interference when required under the terms of the license or other applicable regulations.
(11) Each space station is 10 cm or larger in its smallest dimension.	Chimera-1 is 10 cm or larger in its smallest dimension.
(12) Each space station will have a mass of 180 kg or less, including any propellant.	Chimera-1 has a mass no greater than 100 kg.

Table 2: Small Satellite Streamlining Checklist

IV. PUBLIC INTEREST STATEMENT

Granting of this application would serve the public interest by supporting the continued development of U.S. commercial space capabilities, hosted payload architectures, and low-cost on-orbit technology demonstration services.

Chimera-1 enables multiple commercial and academic payloads to share a single spacecraft platform, reducing the number of satellites required to conduct independent missions and thereby limiting orbital congestion and debris risk.

The mission will support development of communications technologies, propulsion systems, radiation mitigation technologies, and scientific instrumentation while advancing United States leadership in commercial space operations and hosted payload services. These objectives facilitate the policy objectives of the United States, and a grant of this application would be in the public interest.

V. WAIVER REQUEST

Under the Commission’s waiver standard, an applicant must demonstrate that there is “good cause” for granting a waiver and that the request warrants deviation from the applicable rules due to special circumstances.⁹ Moreover, it must be demonstrated that any deviation from the rules will not compromise the overarching policy objectives they are designed to uphold.¹⁰

F. Section 2.106 - Table of Allocations

Oligo requests a waiver of the United States Table of Frequency Allocations set forth in Section 2.106 of the Commission’s rules.

⁹ 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).

¹⁰ See *Northeast Cellular*, 897 F.2d at 1166; see also *WAIT Radio*, 418 F.2d at 1157.

The Commission applies a specific waiver standard to requests involving non-conforming spectrum uses. As the Commission has previously stated, it “may grant a waiver of the Table of Frequency Allocations for non-conforming uses of spectrum when there is little potential for interference into any service authorized under the Table of Frequency Allocations and when the non-conforming operator accepts any interference from authorized services.”¹¹ This standard has been consistently applied in cases involving operations that do not conform to the U.S. Table of Allocations, as well as those that diverge from the International Telecommunication Union (ITU) Radio Regulations.¹²

a. 2025-2110 MHz

Oligo requests a waiver of the U.S. Table of Frequency Allocations for use of the 2025-2110 MHz band to execute the Chimera-1 mission.

Special circumstances justify this waiver to permit Chimera-1 to conduct SOS and SRS operations in this band. Chimera-1’s SOS operations are consistent with the International Table of Frequency Allocations, and its operations align with the technical parameters that are consistent with SRS operations.

Oligo’s proposed uses of the band for command, spacecraft telemetry, mission telemetry and tracking are consistent with Recommendation ITU-R SA.364-6.¹³ As demonstrated in the

¹¹ *Application for Modification of License to Authorize a Second-Generation NGSO MSS Constellation by Iridium Constellation LLC*, Order and Authorization, 31 FCC Rcd 8676 (IB 2016) (“Iridium Order and Authorization”). See also, *Applications by Orbcomm License Corp. For Authority to Modify its Non-Voice, Non-Geostationary Satellite System et al.*, Order and Authorization, 23 FCC Rcd 4804, 4809, para. 15 (IB/OET 2008).

¹² See *Iridium Order and Authorization* at paras 21-22.

¹³ See Recommendation ITU-R SA.364-6Annex, (2) “Space research missions use frequency bands allocated to the SRS to provide the space operation functions as well as the mission telemetry within a single radio system. This allows for more efficient use of the radio-frequency

Technical Annex, Chimera-1 will receive signals from only one U.S. earth station in the S-band uplink. The majority of transmissions in this band will originate from foreign earth stations, where such transmissions are consistent with the International Table of Frequency Allocations. Across all ground station sites, Chimera-1's spectrum use will be infrequent and limited in duration, which will facilitate the protection and coordination of other in-band operations.

Oligo will coordinate its limited use of this band with in-band primary Federal spectrum users to ensure Chimera-1's operations will not interfere with critical U.S. Government missions. Oligo will also coordinate its operations with all commercial and foreign systems as necessary. Accordingly, Chimera-1's operations in the 2025-2110 MHz band will not undermine the Commission's policy of preserving this spectrum for Federal communications, and grant of this waiver would be consistent with both domestic and international spectrum management objectives.

b. 2200-2290 MHz

Oligo requests a waiver of the U.S. Table of Allocations for use of the 2200-2290 MHz band in support of the Chimera-1 mission.

Special circumstances justify this waiver to permit Chimera-1 to conduct SOS and SRS operations within this band. Chimera-1's SOS operations are consistent with the International Table of Frequency Allocations, and its technical parameters align with those typically associated with SRS operations. Additionally, Oligo's proposed uses of the band for command,

spectrum, as well as less stringent requirements for spacecraft power, component space, and weight.”

spacecraft telemetry, mission telemetry and tracking are consistent with Recommendation ITU-R SA.364-6.¹⁴

As detailed in the Technical Annex, Chimera-1 will transmit signals in this band only to earth stations located outside the United States, where such transmissions are consistent with the International Table of Frequency Allocations. At all ground station sites, Chimera-1's spectrum use will be infrequent and limited in scope, which will facilitate the protection and coordination of other in-band operations.

Oligo will coordinate its limited use of this band with in-band primary Federal spectrum users to ensure Chimera-1's operations will not interfere with critical United States Government missions. Oligo will also coordinate its operations with all commercial and foreign systems. Accordingly, grant of Chimera-1's waiver for the utilization of the 2200-2290 MHz band would be consistent with the Commission's policy of preserving this spectrum for Federal use while enabling innovative ISAM demonstrations.

c. 8025-8400 MHz

Oligo respectfully requests a waiver of the U.S. Table of Allocations to permit non-conforming payload and TT&C space-to-Earth transmissions in the 8025-8400 MHz band ("EESS band"). Oligo intends to conduct primary downlink operations in the X-band.

Special circumstances further justify this waiver request. Oligo, like many other U.S. operators, relies on ground-station-as-a-service providers for gateway operations. Commercially

¹⁴ See Recommendation ITU-R SA.364-6Annex, (2) "Space research missions use frequency bands allocated to the SRS to provide the space operation functions as well as the mission telemetry within a single radio system. This allows for more efficient use of the radio-frequency spectrum, as well as less stringent requirements for spacecraft power, component space, and weight."

available ground-station infrastructure capable of supporting the proposed mission profile is presently concentrated in the X-band, making use of this spectrum operationally necessary for the Chimera-1 mission. As Oligo develops future missions, it will continue to explore gateway solutions that conform to the U.S. Table of Allocations. However, the current lack of commercially available alternatives constitutes a special circumstance necessary to justify a waiver. Oligo intends to utilize KSAT's commercially operated global ground station network for TT&C and payload downlink operations.

To mitigate any potential for harmful interference, Oligo will:

- limit operations to approximately five years;
- transmit only over identified ground stations; and
- maintain a minimum three-degree avoidance angle with other co-frequency satellite operators, where necessary to address coordination requests.

The proposed X-band operations would involve low duty cycles and relatively narrow channels. These characteristics, coupled with the relatively light use of the band, will facilitate coordination and ensure that Chimera-1's operations protect existing in-band and adjacent band operations.

The Commission has previously authorized similar non-conforming use of the X-band for SRS missions,¹⁵ recognizing the public interest benefits permitting technically and commercially important SRS missions to operate in this band where sufficient flexibility and risk mitigation protocols are in place to protect in-band users. Oligo's request is consistent with that precedent.

¹⁵ See e.g., Grant, Turion Space Corp, File No. SAT-LOA-20240516-00104, Call Sign S3198 (Dec. 26, 2024).

Accordingly, given the limited risk of harmful interference, the special circumstances driving Oligo's proposed use, and the strong public interest in enabling SRS mission development, a waiver of the Table of Allocations to permit Oligo's non-conforming use of the 8025-8400 MHz band is warranted and in the public interest.

d. 1616–1626.5 MHz

The 1616–1626.5 MHz band is allocated on a primary basis to the Mobile Satellite Service ("MSS") for communications between mobile earth stations and non-Federal space stations. Oligo seeks a limited waiver of Section 2.106 of the Commission's rules to permit Chimera-1 to operate as a space-based user terminal communicating with the Iridium satellite constellation within this band.

Chimera-1 will use the Iridium network solely to support telemetry, tracking, and command ("TT&C") functions. These communications will consist of short-duration, low-duty-cycle transmissions necessary to maintain spacecraft health and safety and to support mission operations. Chimera-1 will not provide commercial MSS offerings, will not communicate with user terminals other than through the Iridium network, and will not provide inter-satellite relay or inter-satellite service functionality.

Oligo emphasizes that Chimera-1 will not operate as an independent MSS system and will not provide Inter-Satellite Service. Rather, Chimera-1 will function as a user terminal operating within the scope of Iridium's existing FCC authorization. Oligo is an Iridium customer and will coordinate all operations in this band with Iridium to ensure compliance with Iridium's network requirements and to prevent harmful interference.

Operations in the 1616–1626.5 MHz band will be conducted on a non-interference, non-protection basis with respect to all authorized services. Chimera-1 will accept any interference from authorized MSS operators, including Iridium, and will not claim protection from such interference. In the event that Chimera-1 operations are determined to cause harmful interference, Oligo will immediately cease transmissions in this band and take all necessary steps to resolve the interference.

Given that (1) Iridium is the sole licensed operator in this band for MSS space station communications, (2) Chimera-1 will operate strictly as a user terminal under Iridium’s network control, (3) transmissions will be low power, infrequent, and limited in duration, and (4) Oligo will coordinate operations directly with Iridium and comply with all applicable technical constraints, grant of the requested waiver will not increase the risk of harmful interference and is consistent with Commission precedent.

VI. Antenna Gain Contours

Pursuant to Section 25.114(c)(4)(vi)(B) of the Commission’s rules, Oligo provides predicted antenna gain contour maps for the Chimera-1 mission’s transmit and receive antenna beams. The complete antenna gain contour figures and associated ground station mappings are provided in the Technical Annex, which is incorporated herein by reference.

The submitted contours correspond to the spacecraft’s S-band receive beam, S-band transmit beam, and X-band transmit beam associated with the proposed mission operations and identified Earth station locations.

The Chimera-1 mission will utilize a globally distributed ground station network supporting S-band telemetry, tracking, and command operations and X-band payload downlink

operations. The associated contour plots demonstrate the operational footprint and gain characteristics of the proposed communications links for each relevant beam configuration.

VII. ITU AND OWNERSHIP REQUIREMENTS

G. ITU Requirements

Commission rules require applicants to provide the Commission with the information required for Advance Publication, Coordination, and Notification of frequency assignment filings, with the International Telecommunication Union.¹⁶ Oligo will submit an Advanced Publication Information (“API”) filing for its proposed mission. In Attachment A, Oligo unconditionally accepts all cost recovery obligations.

H. Ownership Information

Oligo’s ownership structure is attached as Attachment B.

VIII. Conclusion

The Chimera-1 mission will demonstrate both its capabilities as a satellite bus and a hosted payload platform. The hosted payloads onboard Chimera-1 will support technology demonstration, scientific research, propulsion testing, communications validation, and radiation mitigation evaluation that will in turn advance the commercial interests and policy goals of the United States.

¹⁶ See 47 C.F.R. § 25.111.

Oligo therefore respectfully requests that the Commission grant this application no later than January 1, 2027 to support spacecraft integration and launch preparation activities for the Chimera-1 mission.

Respectfully Submitted,

/s/ Corey Mack

Nathan Johnson
Adriane Mandakunis
Aegis Space Law
+1 (832) 677-4854
Counsel for Oligo Space

Corey Mack
Head of Operations
Oligo Space
3457 W El Sgundo Blvd
Suite C
Hawthorne, CA 90250
+1 (310) 529-2006

Dated: August 12, 2026

Attachment A
ITU Cost Recovery Letter

August 12, 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 Chimera-1 Satellite Network Operating in Non-geostationary Orbit in the Non-Planned Frequency Bands. (Chimera-1)

Dear Ms. Dortch,

Oligo Space Inc. (“Oligo”) 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. As a consequence, Commission applicants are responsible for any and all fees charged by the ITU to process their satellite network filings. Oligo hereby states that it is aware of this requirement and unconditionally accepts all cost recovery responsibilities associated with the ITU filings for the Chimera-1 satellite network. Please address all cost-recovery inquiries, and ITU correspondence and filings, related to the Chimera-1 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 Commission within 30 days of the foreseen event.

Point of Contact Name: Jacob Rodriguez
Organization Name: Oligo Space
Address: 3457 W El Segundo Blvd, Suite C
Hawthorne, CA 90250
E-Mail: jrod@oligo.space
Telephone Number: (657) 252-9597

Oligo understands that it must remit payment of any resultant cost-recovery fee 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. We fully understand that a license granted in reliance on such a commitment will be conditioned upon discharge of any such cost-recovery obligation. We also acknowledge 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 Commission may dismiss any application associated with that satellite network.

Sincerely,

/s/Jacob Rodriguez

Jacob

Rodriguez
Founder/CEO

Attachment B
Oligo Space Ownership Information

Oligo Space Inc. (“Oligo”) is a privately held corporation incorporated in the state of Delaware as a C Corporation. The following individuals hold 10% or more of the equity and/or voting interests in Oligo

Shareholder	Citizenship or Country of Incorporation	Equity and/or Voting Interest Percentage
Lux Ventures VIII, L.P.,	USA	10%

The following individuals are on Oligo’s board of directors.

Name	Citizenship
Jacob Rodriguez	USA

The following individuals are Oligo’s officers.

Name	Citizenship or Country of Incorporation	Title
Jacob Rodriguez	USA	CEO

All Oligo board of directors and officers may be reached at the address below:

Oligo Space Inc.
3457 W El Segundo Blvd, Suite C
Hawthorne, CA 90250

Attachment C
List and Description of Onboard Payloads

Chimera-1 Onboard Payloads

Payload Name	Payload Owner	Description
Azora Space	Azora Space	Technology demonstration payload intended to demonstrate high data rate optical communications with a low SWaP terminal.
Melagen Labs Sensor (SpaceDock)	Melagen Labs	The Melagen Labs Sensor is a sensor meant to collect performance data on the Melagen radiation hardening material that will be onboard Chimera-1. It is connected to Chimera-1 through a custom SpaceDock SQUID as the other half. The sensor is powered by Chimera-1 and has no means to independently transmit or receive signals.
CISGAM	CISGAM	To demonstrate on-orbit operation and performance evaluation of the electrospray propulsion system. The mission is not intended to achieve a specific orbital maneuver or delta-v target, but rather to validate system functionality, stability, and endurance in the space environment.
University of Delaware	University of Delaware	Scientific payload consisting of two muon detectors intended to collect space environment and particle interaction data in orbit.
StardustME	StardustME	Memorial payload carrying commemorative human cremated remains for spaceflight memorial purposes.