

FCC Form 312/Schedule A – Pro Forma Transfer

Licensee: EOS Space Spectrum LLC

Transferor: EOS Defense Systems USA, Inc.

Transferee: SpaceLink Corporation

**I. DESCRIPTION OF THE TRANSACTION, PUBLIC INTEREST STATEMENT,
RESPONSE TO QUESTIONS 43 AND A21**

The instant Form 312 application (“Application”) seeks Commission consent for EOS Defense Systems USA, Inc. (“EOS-D”) to transfer control of EOS Space Spectrum LLC (“EOS-S”)¹ and its FCC authority to launch and operate a non-geostationary satellite system (FCC Call Sign S2982) to its sister company, SpaceLink Corporation (“SpaceLink”), a Delaware corporation, (collectively, the “Applicants”), as part of an internal corporate restructuring (the “Transaction”). The transfer of control described herein is *pro forma* in nature and will not result in a change in the actual controlling party of EOS-S or Call Sign S2982.

The *pro forma* transfer of control described herein serves the public interest. Specifically, the *pro forma* transfer will improve engineering and administrative efficiencies by realigning EOS-S under SpaceLink, which has assembled a team of executives and engineers to develop the non-geostationary satellite system involving relay spacecraft in Medium Earth Orbit authorized under Call Sign S2982. This internal realignment will also improve administrative efficiencies and facilitate access to additional funding mechanisms, thereby allowing more expeditious development of the various elements of the satellite system and complementary network infrastructure needed to launch and operate the system.

Please *see* Appendix A for diagrams that show Applicants’ pre- and post- Transaction structure.

II. RESPONSE TO QUESTIONS 40 AND A20 (OWNERSHIP)

Stockholders Holding Greater than Ten Percent Voting Stock of SpaceLink

SpaceLink is a 100% owned direct subsidiary of EOS USA, Inc., a Nevada corporation. No other entity has a 10 percent or greater voting or equity interest in SpaceLink.

SpaceLink Directors and Officers

Directors:

Brig (Ret) Peter Short (ADF)

Sole Director

¹ The Commission was previously informed that Audacy Spectrum LLC had been renamed EOS Space Spectrum LLC. *See Notice of Name Change* from Timothy L. Bransford, Morgan, Lewis & Bockius LLP, to Marlene H. Dortch, IBFS File Nos. SAT-LOA-20161115-00117 and SAT-MOD-20200526-00057 (Dec. 4, 2020).

Officers:

David Bettinger	Chief Executive Officer
Brian Krantz, Esq	Company Secretary (external)
Anthony Colucci	Chief Strategy and Commercial Officer
Larry Rubin	Chief Operating Officer

All officers and directors of SpaceLink, except Peter Short and Brian Krantz, can be contacted at the following address: SpaceLink, 125 Electronics Blvd. SW, Huntsville, AL 35824. Messrs. Short and Krantz can be contacted at the following address: c/o Electro Optic Systems Pty Ltd, 90 Sheppard Street, Hume, ACT 2620 Australia.

Stockholders Holding Greater than Ten Percent Voting Stock of EOS USA, Inc.

EOS USA, Inc. is a 100% owned direct subsidiary of Electro Optic Systems Pty Limited, an Australian company that is the parent operating company for the EOS Group. Electro Optic Systems Pty Limited is a direct, wholly owned subsidiary of Electro Optic Systems Holdings Limited, an Australian public company whose shares are traded on the Australian Securities Exchange. No other entity has a 10 percent or greater voting or equity interest in EOS USA, Inc.

EOS USA, Inc. Directors and Officers

Directors:

Dr. Ben Greene	Director
Dr. Craig Smith	Director

Officers:

BG (Ret) Philip Coker	Chief Executive Officer
Brian Krantz, Esq	Company Secretary (external)
Scott Lamond	Chief Financial Officer

Philip Coker can be contacted at the following address: EOS USA, Inc., 2865 Wall Triana Hwy, Huntsville, AL 35824. Drs. Greene and Smith, as well as Messrs. Krantz and Lamond, can be contacted at the following address: c/o Electro Optic Systems Pty Ltd, 90 Sheppard Street, Hume, ACT 2620 Australia.

Post-Transaction Organization Chart:

