

PUBLIC INTEREST STATEMENT AND REQUEST FOR WAIVER

(Response to Question 35, A21)

By this application, R2 Space, Inc. (“R2 Space”) and Meta Aerospace, LLC (“Meta”) respectfully request the Federal Communications Commission’s (“FCC” or “Commission”) consent, *nunc pro tunc*, to the transfer of control of R2 Space, Inc. and the Earth-Exploration Satellite Service space station network license it holds (Call Sign S3067) from R2 Space to Meta. In conjunction with the new investment by Meta, R2 Space was converted to a limited liability company.

The applicants request a waiver of prior-approval-related transfer of control provisions of 47 CFR § 25.119 to the extent necessary for the filing, acceptance, processing, and grant of the instant application. Due to an administrative oversight, which the parties sincerely regret, the necessary transfer of control application was not filed prior to the close of the transaction. After becoming aware of the oversight and confirmation of the steps necessary to address the issue post-consummation, the applicants commenced the preparation and submission of the instant application.

Grant of the application and associated waiver request will serve the public interest, convenience and necessity by permitting a transaction that maintains the licensed facilities in the hands of the company’s current, experienced management team while at the same time providing a significant infusion of capital to grow the business.¹ The new investment provides critical funding as R2 Space, doing business as Orbital Effects (“OFX”), seeks to expand its existing business and provide broader services to the U.S. military and commercial enterprises requiring high-resolution imagery 24 hours a day. OFX and its principals have a strong track record in the space technology and strategic imaging sectors, which will benefit R2 Space/OFX as it seeks to expand. The availability of substantial additional capital to provide these services will promote enhanced competition in this sector and provide broader choices to both military and commercial users in the marketplace for Intelligence, Surveillance, and Reconnaissance solutions. Grant of the application and waiver request will enable R2 Space to continue to provide these important services under new ownership by Meta. Accordingly, the parties respectfully submit that the instant Application, and associated waiver request, will serve the public interest, convenience and necessity, and should therefore be approved as expeditiously as possible.

¹ The parties are filing an application for Special Temporary Authority contemporaneously with this application to permit continued operation of the R2 Space’s Earth-Exploration Satellite Service space station (Call Sign S3067) in the interim period until the Commission acts on the instant Application and request for waiver.