

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

In the Matter of	)	
	)	
Myriota Pty. Ltd.	)	Call Sign: E202161
	)	
Petition to Amend Application for Blanket	)	File Number: SES-MPL-
Authorization to Operate Myriota-Enabled	)	_____
Terminals in the 399.9-400.05 MHz	)	
and 400.15-401 MHz Frequency Bands	)	
	)	

Petition to Amend Application for Blanket Earth Station Authorization

Myriota Pty. Ltd (“Myriota”) files this application to amend its pending application (the “Amendment”) for a blanket earth station license.¹ The Original Earth Station Application seeks authority to communicate with its non-voice, non-geostationary (“NVNG”) mobile-satellite service (“MSS”) system of small satellites to provide low-power Internet of Things (“IoT”) services (the “Myriota Service”) in the 399.9-400.05 MHz (Earth-to-space) and 400.15-401 MHz (space-to-Earth) bands (collectively, “UHF”).

Pursuant to Section 25.137 of the Federal Communications Commission’s (the “Commission”) rules,² Myriota hereby files this Amendment in order request access to the U.S. market for two Myriota on-orbit radios that are currently operating (the “Myriota System”) and prepared to provide service in the United States.

Furthermore, Myriota seeks authority to add an additional point of communication to communicate with four of Spire Global Inc.’s on-orbit radios,³ which are capable of facilitating the Myriota Service in conjunction with the Myriota System.

¹ See Myriota Pty, Ltd. File No. SES-LIC-20200922-01030; Call Sign: E202161 (“Original Earth Station Application”).

² 47 C.F.R 25.137.

³ These satellites are licensed through Luxembourg. See Spire Global, Inc., File No. SAT-MPL-20200618- 00078; Call Sign: S3045, Narrative at 1.

I. Discussion

The Myriota System

Myriota has a pending space station application (the “Modification”)⁴ before the Commission seeking to modify its existing grant,⁵ which seeks to expand its constellation to 36 satellites (the “Myriota Constellation”) and change the orbital parameters authorized in the original grant.

The Myriota System operates consistent with the radio frequency parameters, orbital parameters, and orbital debris elements articulated in the Modification.⁶ The Myriota system utilizes Spire Global, Inc.’s (the “Provider”) 3U CubeSat platform for each of its two satellites.

Myriota affirms that each of the Provider’s satellites which support the Myriota System all have the propulsive capabilities previously described in the Modification.⁷ The only meaningful distinction between the Modification and the Myriota System is that the Myriota System is only comprised of two satellites.⁸ This is far less than the 36 satellites sought at the time of the Modification or the 26 satellites that were granted access to operate in the United States.⁹ As further detailed below, this limited deployment ensures that the Myriota System will not increase the risk of harmful interference in the UHF spectrum environment,¹⁰ obviating the need for a processing round. Given the limited subset of satellites involved in the market access request and in the interest of clarity, Myriota has filed a Schedule S with this Amendment to provide the precise orbital parameter information regarding the Myriota System. Otherwise, the technical performance of the Myriota System is consistent with the Modification’s Schedule S and is incorporated herein by reference.¹¹

Myriota appreciates the Commission’s continued efforts and guidance regarding its Modification. However, now that the Myriota System is available to provide commercial service in the United States, Myriota is seeking a limited market access authorization for only the current on-orbit Myriota System; not the entire Myriota Constellation as described in the Modification.

⁴ Myriota Pty. Ltd., Petition to Modify U.S. Market Access Authority of the Myriota Non-Voice, Non-Geostationary (“NVNG”) Satellite System Operating in the 399.9-400.05 MHz and 400.15-401 MHz Bands, File Number: SAT-MOD-20211214-00191.

⁵ Myriota, Pty. Ltd., SAT-PDR-20190328-00020, DA 20-571 (granted May 29, 2020) (the “UHF Order”).

⁶ See Modification Narrative, page 1.

⁷ See Modification, Narrative, page 1.

⁸ NORAD IDs: 55037 and 55014.

⁹ See UHF Order at ¶1.

¹⁰ See *Generally* Myriota Pty. Ltd., Call Sign S3047, File Number: SAT-PDR-20190328-00020, Petition for Declaratory Ruling Granting Access to the U.S. Market for Non-Voice, Non-Geostationary Satellite System (the “Original UHF Application”).

¹¹ See Modification, Schedule S.

Myriota notes that the Commission has already determined that the Myriota Service would serve the public interest.¹² Through this Amendment Myriota seeks to facilitate the public interest and begin providing the Myriota Service to its U.S. customers while continuing to work with the Commission to obtain full grant of the Modification.¹³

The Provider's Constellation

As noted above, Myriota also seeks to add part of the Provider's space station¹⁴ as an additional point of communication. The Provider's Constellation includes four Minas-class satellites¹⁵ that are equipped with radios that can support the Myriota Service.

The Provider's Constellation has not been granted market access for the UHF band at this time¹⁶ but has been granted market access in other bands¹⁷ and its request for authority to operate MSS in UHF remains pending. These satellites are equipped with radios that are capable of communicating with the Myriota earth stations without any technical amendments to either the applicable Space Station application¹⁸ or Original Earth Station Application.¹⁹

II. U.S. Market Access for the Myriota System

The Amendment satisfies the Commission's criteria for U.S. market Access. In its DISCO II Order, the Commission established two procedures by which a non-U.S. licensed satellite operator can seek authorization to provide service in the United States.²⁰ One of those procedures allows a company seeking to communicate with a non-U.S. space station may file an application for an initial earth station license, listing the non-U.S. space station as a "point of communication," and demonstrating that the space station meets all applicable Commission requirements.²¹ This procedural option was developed for instances where a "non-U.S. satellite is

¹² The UHF Order at ¶ 5.

¹³ See *Generally* Modification, at Narrative and Tech Description. Myriota notes that it expects to further amend the Modification application in the near future.

¹⁴ Call Sign S3045 (the "Provider's Constellation").

¹⁵ NORAD ID 52732; NORAD ID 52736; NORAD ID 55013; and NORAD ID 55038.

¹⁶ Spire Global, Inc. File Number: SAT-MPL-20200618- 00078, Call Sign: S3045, Grant at 2.

¹⁷ *Id.*

¹⁸ See *Generally* Spire Global, Inc. File Number: SAT-MPL-20200618- 00078, Call Sign: S3045, Sched S Tech Report, Exhibit B, Spire Global, Inc. ("Spire") Orbital Debris Risk Mitigation Plan, UHF showing/incorporation. See also Spire Global, Inc., *Application to Amend SAT-LOA-20151123-00078*, File Number: SAT-AMD-20161114-00107, Call Sign: S2946, Schedule S Tech Report at 3, 19, 21 and Exhibit A at 18-22.

¹⁹ Original Earth Station Application at Technical Information (pages 4-10).

²⁰ See *Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, 12 FCC Rcd 24094, ¶ 188 (1997) ("DISCO II Order"). See also *Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, 15 FCC Rcd 7207, ¶ 5 (1999) ("DISCO II Recon Order"); 47 C.F.R. § 25.137.

²¹ See DISCO II Recon Order at ¶ 5.

already launched and international coordination has been initiated.”²² The Myriota System, an already-launched, non-U.S. satellite system, which has initiated international coordination, fits this description exactly.

When evaluating an earth station market access application, the Commission considers the effect on competition in the United States, spectrum availability, eligibility and operational requirements, and concerns related to national security, law enforcement, foreign policy, and trade.²³ Myriota incorporates by reference its previous demonstration that the Myriota Service will satisfy each element of this test and grant of the Myriota System will serve the public interest.²⁴

By utilizing this long-standing Commission process for seeking market access and, through incorporation of its previously successful showing under Section 25.137 of the Commission’s rules, Myriota has met the Commission’s criteria for market access and respectfully requests a grant of this amendment.

III. Grant of this Amendment will Serve the Public Interest

As noted above, the Commission found that granting Myriota access to the U.S. market was in the public interest.²⁵ Now that Myriota is ready to begin commercial service, it is in the public interest to facilitate the provision of beneficial services while the Commission continues to process the pending Modification application. In fact, Myriota is ready to provide service in the United States now and seeks to offer this service to its U.S. customers as soon as April 2023.

Action here will similarly not undermine intent of the Commission’s rules and is consistent with the Commission’s long-standing policy. As discussed above, the earth station market access application process was developed specifically to enable on-orbit foreign licensed satellite systems like the Myriota System to provide service in U.S.²⁶

Nor will the Myriota System pose a higher likelihood of harmful interference than the constellation authorized by the UHF Order. As demonstrated below, the limited number of satellites that make up the Myriota System will necessarily have a lesser impact on the spectrum environment as compared to the original 26-satellite system in Myriota’s Original UHF Application or the 36-satellite system proposed by the Modification.

Enabling the Myriota Service through this Amendment is in the public interest, because the Amendment is consistent with Commission policy and will not create an additional risk of harmful interference to other operators in the band. Myriota therefore respectfully requests the expeditious grant of this Amendment.

IV. Waiver Requests

²² DISCO II Order at ¶ 55.

²³ DISCO II Order at ¶ 29.

²⁴ See Original UHF Application, Legal Narrative at 12.

²⁵ UHF Order at ¶ 5.

²⁶ DISCO II Order at ¶ 55.

Pursuant to Section 1.3 of the Commission’s rules, the Commission may waive its rules for good cause.²⁷ “Waiver is appropriate if special circumstances warrant a deviation from the general rule and such deviation would better serve the public interest than would strict adherence to the general rule.”²⁸ In determining whether waiver is appropriate, the Commission should “take into account considerations of hardship, equity, or more effective implementation of overall policy.”²⁹ As demonstrated below, each of Myriota’s waiver requests in the Amendment is specifically justified and should be granted for good cause and in service of the public interest.

Waiver of Section 25.157 of the Commission’s rules

While the Commission does not routinely grant processing round waivers,³⁰ the specific facts of the Myriota System justify such an action. Here, the Myriota System is not a new system but rather the already-deployed segment of the Myriota Constellation, which has previously been subjected to a processing round. Therefore, there is no need to initiate a new processing round and good cause to grant this waiver request.

When the Commission instituted the policy to permit market access through earth station applications, it did so with the explicit intent to consider such applications without initiating a processing round. “[O]perators seeking to access a non-U.S. satellite could file an earth station application that we could consider independent from a processing round. This would occur where the non-U.S. satellite is already launched and international coordination for that satellite has been initiated.”³¹ The procedure undertaken here is entirely consistent with this longstanding policy and the Commission should, as envisioned in the DISCO II Order, process this Amendment without initiating a new processing round.

Further, the Amendment does not present the possibility of altering the spectrum environment in UHF in a way that would undermine the expectations of the remaining processing round applicants³² or preclude future applicants.³³ Although the orbital architecture of

²⁷ 47 C.F.R. § 1.3. See also *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972); *Northeast Cellular Telephone Co., LP v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990).

²⁸ *GE American Communications, Inc.*, 16 FCC Rcd. 11038, ¶ 9 (IB 2001).

²⁹ *WAIT Radio*, 418 F.2d at 1159.

³⁰ See *In the Matter of Kuiper Systems, LLC Application for Authority to Deploy and Operate a Ka-band Non-Geostationary Satellite Orbit System*, Order and Authorization ¶ 44 (2020) (“Kuiper Order”).

³¹ DISCO II Order at ¶ 55.

³² *Update to Parts 2 and 25 Concerning Nongeostationary, Fixed-Satellite Service Systems and Related Matters*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd. 7809, ¶ 61 (2017) (“NGSO R&O”). In the NGSO R&O, The Commission has acknowledged a public interest in protecting the “existing expectations” of processing round applicants.

³³ See *Northrop Grumman Space & Mission Systems Corporation*, 24 FCC Rcd. 2330, ¶¶ 23-34 (IB 2009) (waiving processing round requirements for an NGSO system because access will not preclude additional entry); *Space Imaging, LLC*, 20 FCC Rcd. 11964, ¶ 10 (IB 2005) (same); *Lockheed Martin Corporation*, 20 FCC Rcd. 11023, ¶ 15 (IB 2005) (same).

the Myriota System is consistent with the description in the Modification, the Myriota System only consists of two satellites, 24 less than the constellation authorized original Myriota UHF Order.³⁴ As discussed below, the use of spectrum by each Myriota satellite, including channel sizes and duty cycles, will be consistent with the individual satellite operations detailed in both the Original UHF Application³⁵ and the Modification.³⁶ Because the Myriota System will have the same operational use of spectrum per satellite with significantly less satellites, it cannot increase the risk of harmful interference in the UHF spectrum environment³⁷ or preclude future entry beyond the constellation that has already been granted in the UHF Order.

Finally, Myriota expects that any future Commission determination regarding the processing round status of the Myriota Constellation pursuant to the pending Modification will apply to the Myriota System.

Waiver of Section 25.165 of the Commission's Rules

To the extent necessary and out of an abundance of caution, Myriota requests that the Commission waive Section 25.165 of its rules and not apply a bond to the Myriota System. Section 25.137(d)(4) of the Commission's rules requires a bond to be posted where an earth station applicant seeks to communicate with non-U.S. licensed satellites that are not in orbit and operating.³⁸ But the Commission's rules do not provide any specific guidance as to when a foreign licensed system has already fully deployed, as the Myriota System has.

As stated above the Myriota System is a subset of the Myriota Constellation, which is already subject to a bond.³⁹ Therefore the Commission's policy objectives have already been met by the application of a bond to the full Myriota Constellation and there is no public interest benefit to applying a second, redundant bond to the Myriota System.

In the past, the Commission has waived bond requirements for systems that have achieved certain bond milestones prior to grant⁴⁰ and it should do so for the Myriota System as well. Here, the Myriota System has been fully deployed and there are no satellites that are part of the Myriota System that are not in orbit and operating. Therefore, Myriota System has already achieved any Bond milestones that might have otherwise been applied to it and there is no need to apply a bond to the Myriota System under the Commission rules.

Waiver of Section 25.159

³⁴ See UHF Order at ¶ 1.

³⁵ Original UHF Application, Attachment A, Technical Information to Supplement Schedule S at 9-10, 13.

³⁶ See Modification, Technical Description at 7.

³⁷ See NGSO R&O at ¶ 61.

³⁸ 47 C.F.R. 25.137(d)(4).

³⁹ See UHF Order, ¶ 33.

⁴⁰ See O3b Limited, File Number: E100088, File Number: SES-LIC-20100723-00952, Grant (Sept. 25, 2012) at Condition 90047.

To the extent necessary, Myriota requests a waiver of Section 25.159 of the Commission's rules. The Amendment does not run afoul of this rule related to limits on pending applications and unbuilt systems⁴¹ because the Myriota System is part of the Myriota Constellation and should not be considered a new, separate system from the one contemplated in the Modification.

Myriota, consistent with the Commission's rules, has only applied for one satellite system to operate in UHF. This Amendment only seeks authorization of a limited segment of that system that is currently on-orbit and available to provide service, not a wholly distinct system that would trigger Section 25.159 of the rules. Therefore, should a waiver be required, grant would be consistent with Commission policy and in the public interest.

Waiver of Additional FCC Rules as Needed

The Commission has, in select circumstances, waived certain technical rules for on-orbit systems that cannot modify relevant technical characteristics.⁴² Although Myriota is not aware of any further rules that require a waiver request, it respectfully asks that the Commission waive any rules as needed to the extent that they relate technical matters that cannot be addressed for an on-orbit system. Myriota has demonstrated that grant of its application is in the public interest and that it will not pose additional a risk of harmful interference. Myriota believes that should additional waivers be required that the above showings offer sufficient justification for the grant of this waiver request.

V. Ownership Information

Myriota affirms that its ownership information has not changed since it filed the Modification. Myriota has provided in Annex A an overview of its ownership, which is consistent with what it provided the Commission in the Modification.⁴³

⁴¹ 47 C.F.R. 25.159.

⁴² See e.g. Empresa Brasileira de Telecomicações S.A., Order, File No. SAT-PDR-20000111-00047 (January 12, 2001) ¶¶9-11.

⁴³ See Modification, Application Narrative, Annex A (page 23).

VI. Conclusion

As demonstrated herein and in the accompanying technical annex, Myriota fully satisfies the Commission's requirements under the DISCO II Order for market access. Additionally, with the exception of a some select waivers, the Myriota System complies with the Commission's Part 25 rules. Therefore, grant of this application is in the public interest and Myriota respectfully requests that the Commission expeditiously grants this application.

Respectfully Submitted,

/s/ Yulia Kulikova

Director of Regulatory Affairs
Myriota Pty. Ltd.
Level 1, McEwin Building, Lot 14, North
Terrace
Adelaide, Australia

Of Counsel
Will Lewis
Aegis Space Law
1946 Cambridge Dr.
Crofton, MD 21114
(203) 856-8528

Technical Annex

Myriota Pty. Ltd (“Myriota”) files this application to amend its pending application for blanket earth station authorization (the “Amendment”). The earth station application seeks authority to communicate with its non-voice, non-geostationary (“NVNG”) mobile-satellite service (“MSS”) system of small satellites to provide low-power Internet of Things (“IoT”) services in the 399.9-400.05 MHz (Earth-to-space) and 400.15-401 MHz (space-to-Earth) bands (collectively, “UHF”).

This Technical Annex provides the Commission with information regarding changes to the Myriota System as required by 47 C.F.R. §§ 25.114 and other relevant sections of Part 25 of the Commission’s rules as well as its long standing policies.⁴⁴ It also incorporates by reference all necessary technical information as it relates to the communications between Myriota’s earth stations and the Provider’s Constellation.

New Point of Communication – Provider’s Constellation

Myriota seeks to add Call Sign S3045 as a point of communication through it’s amendment. In order to do so, it seeks to incorporate the technical information provided in Myriota’s Original Earth Station Application as well as the technical information related to spectrum use and orbital debris provided by the Provider in the applicable application dockets for the Provider’s Constellation.⁴⁵

The Myriota Service - Frequency Use

Space Segment

The space segment of the Myriota System and the radios onboard the Provider’s satellites is consistent with the orbital architecture, with a lower number of satellites, and frequency use described in the technical description of the Modification.⁴⁶ Myriota affirms that the on-orbit radios supporting the Myriota service will operate using duty cycles, power densities, channel sizes and other operational parameters related to spectrum use that will be consistent with the values provided in the Modification.⁴⁷

In accordance with this affirmation Myriota hereby incorporates by reference the Schedule S accompanying its Modification as well as the applicable technical demonstrations

⁴⁴ DISCO II at n. 44.

⁴⁵ See *Generally* Spire Global, File Number: SAT-MPL-20200618- 00078, Call Sign: S3045, Sched S Tech Report, Exhibit B, Spire Global, Inc. (“Spire”) Orbital Debris Risk Mitigation Plan, UHF showing/incorporation. See also Spire Global, Inc., *Application to Amend SAT-LOA-20151123-00078*, File Number: SAT-AMD-20161114-00107, Call Sign: S2946, Schedule S Tech Report at 3, 19, 21 and Exhibit A at 18-22.

⁴⁶ Modification, Technical Description at Sections A.3, A.4.2, A.4.4.

⁴⁷ *Id.* At A.4.2, A.4.4.

from the Modification and the Original UHF Application as they pertain to the characteristics of the Myriota Service's spectrum use.⁴⁸

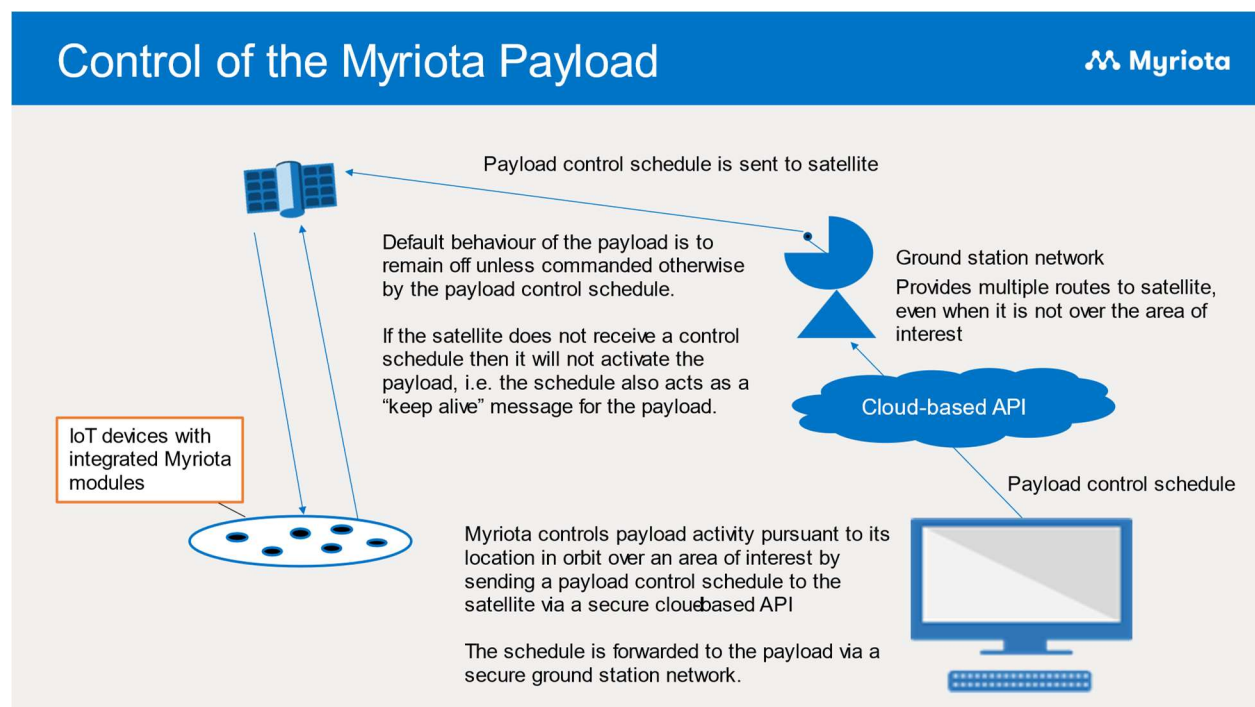
Ground Segment

The technical and operational characteristics of the Myriota ground stations remains identical to the information provided to the Commission in Myriota's Original Earth Station Application.⁴⁹ The Original Earth Station Application has already been subject to Public Notice and no comments were filed during the comment period.⁵⁰ The earth stations can communicate with the Myriota System as described in the previous application and therefore no amendments are necessary for the operational characteristics of the ground segment of the Myriota System.

The Management of the Myriota System

In the interest of clarifying how Myriota will manage the Myriota System's use of spectrum, Myriota is providing an overview of how it controls the transmissions from its on-orbit radios.

Exhibit 1 – The Myriota Communications Architecture



⁴⁸ See Modification, Technical Description, Schedule S Tech Report. See also Original UHF Application, Technical Description, Schedule S Tech Report.

⁴⁹ See Generally Original Earth Station Application, Narrative at 4-10.

⁵⁰ See Original Earth Station Application, IBFS Docket at "Other Filings," available at: https://licensing.fcc.gov/cgi-bin/ws.exe/prod/ib/forms/reports/related_filing.htm?f_key=-449040&f_number=SESLIC2020092201030. See also,

As demonstrated in Exhibit 1 above, Myriota maintains direct control over the Myriota System's use of UHF and has a process and multiple redundancies in place to ensure that the Myriota System will operate in accordance with its coordination agreements and the Commission's rules.

A key characteristic of the Myriota System is that its default behavior is to remain off and will only transmit when it receives the appropriate, encrypted signal from Myriota. The transmissions from the Myriota System are managed by a software defined schedule that ensures that the Myriota System will only transmit based on its customer needs and in compliance with the applicable coordination and regulatory requirements. The Myriota architecture also enables Myriota to quickly "turn off" the Myriota System in the event that there is a potential occurrence of harmful interference or other unanticipated issues that may arise on orbit.

In the event that there are any potential issues that arise out of the Myriota System's operation, Myriota has a point of contact that is available 24 hours a day, 7 days a week that is capable of quickly communicating new operating schedules or turning off transmissions entirely as needed.

Other NVNG UHF Operators

There are only two other remaining UHF processing round applicants.

One of the remaining operators is Kineis.⁵¹ Myriota has not completed coordination with Kineis but continues to negotiate in good faith. In the event that coordination has not been completed by the time Kineis launches its system, Myriota will operate consistent with the condition articulated of its original market access grant: "Absent a coordination agreement, spectrum will be divided among licensees and grantees of U.S. market access pursuant to section 25.157 of the Commission's rules."⁵²

The other remaining operator is The Provider.⁵³ Myriota is still working to complete coordination with the Provider. However, given the existing relationship between Myriota and the Provider, Myriota does not anticipate any issues coordinating its use of UHF spectrum with the Provider's UHF operations.

Orbcomm also operates in the UHF spectrum. Myriota has completed coordination with Orbcomm and notified the Commission at the time.⁵⁴

⁵¹ See *Generally* Kineis, File Number: SAT-PDR-20191011-00113.

⁵² UHF Order at ¶ 13.

⁵³ See *Generally* Spire Global, File Number: SAT-MPL-20200618-00078, Call Sign: S3045, Sched S Tech Report, Exhibit B, Spire Global, Inc. ("Spire") Orbital Debris Risk Mitigation Plan, UHF showing/incorporation. See also Spire Global, Inc., *Application to Amend SAT-LOA-20151123-00078*, File Number: SAT-AMD-20161114-00107, Call Sign: S2946, Schedule S Tech Report at 3, 19, 21 and Exhibit A at 18-22.

⁵⁴ See Letter from Carlos Nalda for Myriota Pty. Ltd., to Marlene H. Dortch, Secretary, FCC (Filed April 30, 2021).

Coordination with Federal Users

Myriota certifies its proposed operations in this Amendment are consistent with its existing coordination agreements with federal users.

Orbital Debris Mitigation Plan

Myriota affirms that the Myriota System will be on 3U satellites consistent with those described in the Modification.⁵⁵ All of the satellites supporting the Myriota System will be capable of operating in a manner consistent with the statements made in the Modification's Orbital Debris showing.⁵⁶ As previously noted, the satellites supporting the Myriota System are equipped with propulsion systems.

Myriota further incorporates the following statements made regarding the below information that was initially provided in a response to a Commission Request for Further Information⁵⁷:

- Its showing regarding its process for responding to Conjunction Data Messages and its collision avoidance process.⁵⁸
- The internal pressure is sufficiently low as to not represent a hazard to the spacecraft, with a safety factor of over 6000 through the mechanical design.⁵⁹
- The batteries and power system will be maintained in a safe state throughout the life of the spacecraft until the point of re-entry and so will not require the batteries to be discharged.⁶⁰
- The its function of propulsion requires the following performance over the life of the mission.⁶¹

Finally, Myriota is providing an updated Schedule S to reflect updated information related only to the operational orbits of the Myriota System. The operation of the Myriota System otherwise remains consistent with the parameters of the Modification⁶² and the updated Schedule S merely reflects the on-orbit status of the Myriota System which Myriota to provide more precise orbital information than it could prior to the launch of these four satellites.

⁵⁵ See Modification at 1, 3, 6.

⁵⁶ *Id.* at Technical Description at A.5 (pages 13-25).

⁵⁷ See Letter from Carlos Nalda for Myriota Pty. Ltd., to Marlene H. Dortch, Secretary, FCC (Filed April 15, 2022).

⁵⁸ *Id.*) at pages 2-3, answer to question 3.

⁵⁹ *Id.* at 3-4, answer to question 5.

⁶⁰ *Id.* at 4, answer to question 5.

⁶¹ *Id.* at 4, answer to question 6.

⁶² See Modification, Technical Description at A.3 (pages 4-5); Schedule S.

Engineering Certification

I hereby certify that I am the technically qualified person responsible for preparation of the engineering information contained in this modification, that I am familiar with Part 25 of the Commission's rules, that I have either prepared or reviewed the engineering information submitted in this application, and that it is complete and accurate to the best of my knowledge and belief.

/s/ David Haley

Dr. David Haley
Chief Technology Officer
Myriota Pty. Ltd.
Level 1, McEwin Building, Lot 14, North
Terrace
Adelaide, Australia