TRANSACTION DESCRIPTION AND PUBLIC INTEREST STATEMENT

Pursuant to the Federal Communications Commission's ("FCC" or "Commission") rules,[1] ALL.SPACE Networks Ltd. ("ALL.SPACE"); All.Space Holdings, Inc. ("HoldCo"); and York Space Systems Inc. ("York" and together with ALL.SPACE and HoldCo, the "Applicants") request FCC consent for the transfer of control of FCC authorizations held by ALL.SPACE from HoldCo to York (the "Transaction"). As discussed more fully herein, grant of the requested Transaction is consistent with the Commission's rules and will serve the public interest. Accordingly, the Applicants respectfully request expeditious FCC consent to the Transaction.

I. THE PARTIES

A. ALL.SPACE and HoldCo

ALL.SPACE developed the world's first multi-orbit, multi-link satellite connectivity platform as part of its mission to solve the challenges of multi-orbit communications. ALL.SPACE's optical beamforming Earth Stations in Motion ("ESIMs") are capable of simultaneous communication with multiple satellites across multiple orbits. For government and commercial users, ESIMs offer numerous benefits, such as dynamic satellite resource allocation and enhanced satellite capacity management. Further, the platform's fully configurable, scalable architecture supports connectivity on vehicles and vessels where size limitations prohibit multiple antenna installations. A list of ALL.SPACE's FCC licenses and pending applications is provided in Attachment 1.

A diagram of ALL.SPACE's current ownership structure is provided in Attachment 2. In February 2026, ALL.SPACE completed a corporate restructuring to change its domicile from the United Kingdom to the United States (the "Reorganization"). Pursuant to the Reorganization,

[1] *See* 47 C.F.R. §§ 25.119, 5.79.

ALL.SPACE established HoldCo (the transferor in the Transaction), a Delaware holding company, as ALL.SPACE's parent company. HoldCo purchased all ownership interests in ALL.SPACE, with the consideration being equivalent securities of HoldCo. The Reorganization resulted in no actual change in the ultimate control of ALL.SPACE.

To the extent necessary, ALL.SPACE respectfully requests waiver of Sections 5.79 and 25.119 of the FCC's rules to permit the correction of its ownership information *nunc pro tunc* in connection with the instant application's submission.[2] The Commission may grant waivers where strict application of the rule would not serve the rule's underlying purpose or would be otherwise inequitable or contrary to the public interest.[3] Here, the Reorganization, completed in February 2026, produced no change in the ultimate control of ALL.SPACE; any failure to notify the Commission was inadvertent, and the instant application corrects the record at the earliest practicable opportunity. For these reasons, there is good cause to grant the waiver request and such grant would serve the public interest.

B. York

York is a U.S. space and defense company headquartered in Denver, Colorado, that provides a comprehensive suite of mission-critical solutions for national security, government, and commercial customers. York is one of the only space and defense prime contractors with proprietary hardware and software capabilities designed to address customers' complex mission requirements across the critical elements of the entire space ecosystem throughout the mission lifecycle. York provides customers a vertically integrated, full technology stack of solutions including design, production, integration, and operation of spacecraft with turnkey offerings to

[2] *See* 47 C.F.R. §§ 5.79(a), 25.119(a), (f). *See also* 47 C.F.R. § 1.3.

[3] *See, e.g.*, *WAIT Radio, Inc. v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

manage spacecraft and constellations throughout their entire mission lifecycle. York is purpose built to address evolving national security space challenges and to adapt to the ongoing shift in the U.S. government's mission needs and procurement processes.

York has been publicly traded on the New York Stock Exchange (NYSE: YSS) since completing its initial public offering in January 2026.

II. DESCRIPTION OF TRANSACTION

Pursuant to an Agreement and Plan of Merger among York; Project Morpheus Merger Sub I, Inc. ("Merger Sub One"); Project Morpheus Merger Sub II, LLC ("Merger Sub Two"); HoldCo; and Shareholder Representative Services LLC[4] dated April 29, 2026, the Applicants plan to engage in a multi-step merger process as outlined below.

1. Merger Sub One, a wholly-owned subsidiary of York, will merge with and into HoldCo (the "First Merger"), with HoldCo as the surviving entity (the "First Merger Surviving Corporation").
2. Immediately following the First Merger, the First Merger Surviving Corporation will merge with and into Merger Sub Two, a wholly-owned subsidiary of York (the "Second Merger"), with Merger Sub Two as the surviving entity (Merger Two to be renamed All.Space Holdings, LLC, the "Surviving Company").
3. Immediately following the Second Merger, York will effectuate a series of capital contributions among its affiliates,[5] after which the Surviving Company will be a wholly

[4] Shareholder Representative Services LLC will represent the selling securityholders with respect to post-closing matters such as escrows, purchase price adjustments, and indemnification claims. It serves only an administrative and representative role (i.e., not an owner, buyer, or guarantor role).

[5] York will contribute 100% of the equity interests of the Surviving Company to Yellowstone Midco Holdings, LLC. Yellowstone Midco Holdings, LLC will contribute those interests to

owned, indirect subsidiary of York.[6]

A diagram of the post-closing corporate ownership structure for ALL.SPACE is included in Attachment 2, and a breakdown of the 10% and greater interest holders, officers, and directors is included in Attachment 3.

III. THE TRANSACTION WILL SERVE THE PUBLIC INTEREST

To approve the Transaction, the Commission must determine whether the transfer of control of ALL.SPACE to York is consistent with the public interest, convenience, and necessity.[7] To determine whether the Transaction would serve the public interest, the Commission conducts a two-step assessment. It first assesses whether the Transaction complies with the Communications Act, other applicable statutes, and the Commission's rules, including whether the applicant has the requisite "citizenship, character, and financial, technical, and other qualifications."[8] It then determines whether the transaction will serve "the public interest, convenience, and necessity" by weighing the transaction's public interest benefits and any potential harms.[9]

The Transaction satisfies both prongs of this two-step review. *First*, the Applicants have the requisite qualifications to hold and control licenses.[10] ALL.SPACE currently holds FCC

Yellowstone InterCo Holdings, LLC. Yellowstone InterCo Holdings, LLC will contribute those interests to Yellowstone Borrower, LLC.

[6] Following these steps, ALL.SPACE will be a wholly owned, direct subsidiary of the Surviving Company.

[7] *See* 47 U.S.C. § 310(d); 47 C.F.R. §§ 25.119(a), 5.79(a).

[8] 47 U.S.C. § 308(b).

[9] *Id.* § 310(d); *Applications of SES S.A. and Intelsat S.A. For Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, 40 FCC Rcd 4919 ¶¶ 9-11 (2025).

[10] There are no pending enforcement actions, adverse character determinations, or other proceedings that would call into question the basic qualifications of any party to this transaction.

authorizations, and as described above, York is a well-established aerospace and defense company and trusted partner to U.S. government customers that is fully qualified to control FCC licenses.[11] Accordingly, the Transaction satisfies all applicable provisions of the Communications Act and FCC rules, regulations, and policies and will not result in any violation thereof.

Second, the Transaction will serve the public interest, convenience, and necessity. Notably, the Commission recognizes "the clear public interest benefits in a license or authorization holder being able to assign or transfer control of its license or authorization freely."[12] Moreover, the Commission has recognized the importance of "transaction-specific public interest benefits, such as . . . service enhancements and certain other efficiencies" in evaluating the merits of a transaction.[13] Here, the Transaction will deliver significant public interest benefits by combining the Applicants' complementary capabilities, strengthening their ability to compete and respond to evolving market conditions and U.S. national security priorities.

The Transaction will deliver substantial public interest benefits by combining the Applicants' complementary capabilities and resources. ALL.SPACE has a proven multi-orbit

[11] The Applicants are aware that the Commission adopted new rules for licensee attestations regarding foreign adversary control. *See generally Protecting Our Communications Networks by Promoting Transparency Regarding Foreign Adversary Control*, Report and Order, GN Docket No. 25-166, FCC 26-2, at Appendix A (newly adopted 47 C.F.R. § 1.80003) (rel. Jan. 30, 2026). The Applicants note that while this Report and Order is scheduled to become effective on June 9, 2026, the filing date for such foreign attestations and ownership disclosures has been delayed indefinitely pending Office of Management and Budget review. *See* 91 Fed. Reg. 18670 (Apr. 10, 2026). The Applicants will comply with the applicable disclosure requirements once the compliance date has been established by the Commission.

[12] *Applications of Level 3 Communications, Inc. and CenturyLink, Inc. for Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, 32 FCC Rcd 9581 ¶ 10 (2017).

[13] *See Applications of Viasat, Inc. and Connect Topco Limited for Consent to Transfer Control of Authorizations*, Memorandum Opinion and Order and Declaratory Ruling, 38 FCC Rcd 4776 ¶ 46 (SB/OIA 2023).

communications platform that provides flexibility and enhanced capabilities on vehicles and ships. York, in turn, brings more than a decade of experience delivering mission-critical space capabilities for customers, supported by engineering expertise, systems integration, ground software solutions, and on-orbit capabilities. Additionally, the Transaction will provide ALL.SPACE with financial resources, operational support, and commercial synergies from York, enhancing its ongoing efforts to improve operational efficiency while continuing to provide customers with reliable ground terminal connectivity solutions. Consummation of the Transaction will also enable ALL.SPACE to continue developing its novel technologies and improve its offerings for both government and commercial customers.

The Transaction is additive and will not result in competitive harms, service disruption, or other public interest concerns. It does not combine competing satellite communications providers; rather, it aligns distinct yet complementary products and platforms across the space services ecosystem. ALL.SPACE will benefit from York's scale, customer base, and operational synergies while York will leverage ALL.SPACE's multi-orbit, multi-band satellite terminal technologies to enhance integrated service offerings to customers across key verticals. Accordingly, the Transaction will deliver public interest benefits through improved capabilities and integration without reducing service availability or customer choice.

IV. ADDITIONAL AND PENDING APPLICATIONS

The list of call signs and file numbers in Attachment 1 is intended to include all FCC licenses and pending applications held by ALL.SPACE. However, ALL.SPACE may now have on file and may hereafter file additional applications before the Commission acts on the Transaction. Accordingly, the Applicants request that any FCC approval of the transfer-of-control applications include authority for York to acquire control of (i) any additional licenses and authorizations issued to ALL.SPACE prior to grant of the transfer of control applications or during the period required for consummation following grant and (ii) any applications (including applications for special temporary authority), petitions, or other filings that have been submitted by ALL.SPACE and are pending at the time of consummation of the Transaction. Such action would be consistent with prior FCC precedent.[14] Following the consummation of the Transaction, any pending applications will be supplemented as required under the Commission's rules to reflect the new ownership structure.[15]

V. CONCLUSION

For the above reasons, the Applicants respectfully request that the Commission expeditiously consent to the Transaction.

Respectfully submitted,

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Counsel to ALL.SPACE

May 5, 2026

[14] *See, e.g.*, *Intelsat S.A., as Debtor-in-Possession, (Transferor) and New TopCo S.A. (Transferee)*, Order, 37 FCC Rcd 1837 ¶ 22 (IB/WTB/OET 2022).

[15] *See* 47 C.F.R. § 1.65.

Attachment 1 – FCC Licenses and Pending Application

FCC Licenses

Call Sign	Application File Number(s)	Authorization Type
E240137	SES-LIC-20240516-01485 SES-AMD-20250307-00325	Earth stations in motion
WP2XDD	0774-EX-CN-2024	Experimental
WQ2XAU	0651-EX-CN-2025	Experimental

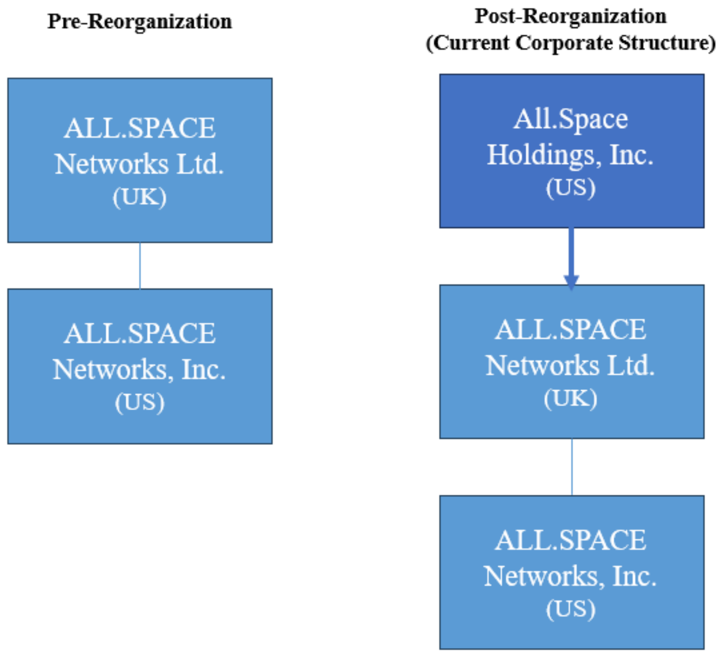
Pending FCC Application

Call Sign	Application File Number	Application Type
WQ2XHC	1109-EX-CN-2025	Experimental

Attachment 2 – Pre- and Post-Closing Organizational Charts

Pro Forma Reorganization[1]

All.Space Holdings, Inc. was established as a new U.S. holding company that sits above ALL.SPACE Networks Ltd. (UK) and ALL.SPACE Networks, Inc. (US).[2]

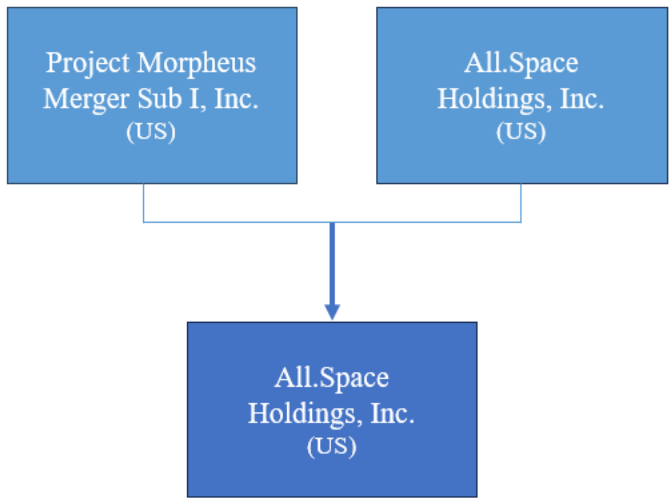


[1] All links are 100% ownership and voting rights. Shareholding rights are equal to voting rights. Darker blue shading reflects the new or resulting entity.

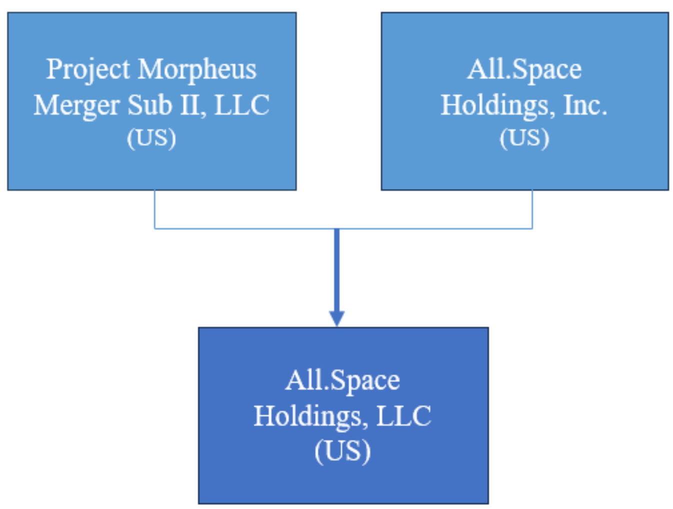
[2] Given FCC Experimental Licensing System limitations, the attached Form 703 lists an outdated ALL.SPACE address. The correct address is 2914 Green Cove Road, Suite AS, Huntsville, AL 35803 as reflected in the other application materials and in CORES.

Proposed Transaction

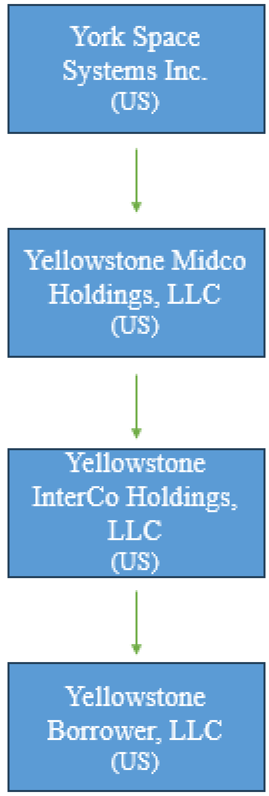
Step 1: Project Morpheus Merger Sub I, Inc. merges with and into All.Space Holdings, Inc. with All.Space Holdings, Inc. as the surviving entity.



Step 2: All.Space Holdings, Inc. merges with and into Project Morpheus Merger Sub II, LLC, with All.Space Holdings, LLC as the surviving entity.

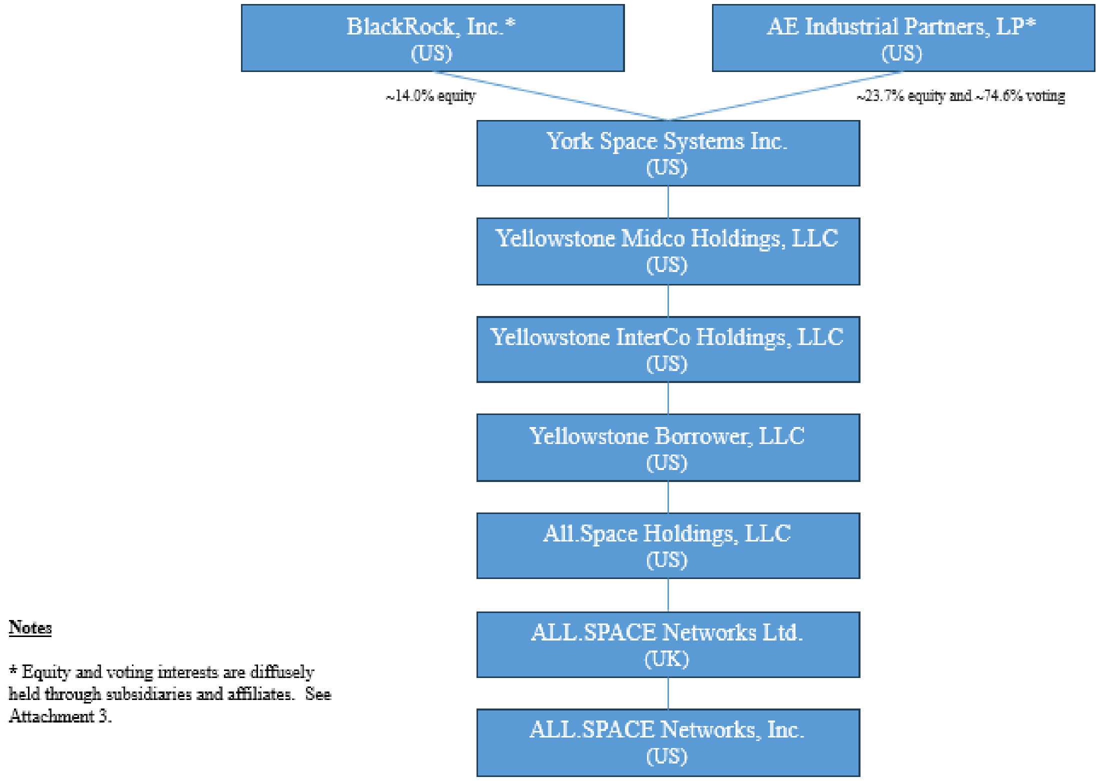


Step 3a: York Space Systems Inc. transfers 100% of the equity interests of All.Space Holdings, LLC.[3]



[3] Green arrows show the transfer of 100% of the equity interests of All.Space Holdings, LLC. *See supra* note 5.

Step 3b: Under the following post-close corporate structure, All.Space Holdings, LLC becomes a wholly owned, indirect subsidiary of York Space Systems Inc.; Yellowstone Midco Holdings, LLC; and Yellowstone InterCo Holdings, LLC and a wholly owned, direct subsidiary of Yellowstone Borrower, LLC,[4][5] *and ALL.SPACE Networks Ltd. remains a wholly owned, direct subsidiary of All.Space Holdings, LLC.*



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[4] Unless otherwise indicated, all links are 100% ownership and voting rights.

[5] The 10% or greater interest holders in York are included in Attachment 3.

ATTACHMENT 3

OWNERSHIP, OFFICERS, AND DIRECTORS INFORMATION

The proposed post-closing ownership and control of ALL.SPACE Networks Ltd. ("ALL.SPACE") is set forth below. As explained in the Transaction Description and Public Interest Statement, the instant application reflects a multi-step transaction involving the transfer of control of ALL.SPACE to York Space Systems Inc. ("York").[1] Upon consummation of the transaction, ALL.SPACE will have the following 10% or greater shareholders (voting or equity).

Ownership of ALL.SPACE

All.Space Holdings, LLC

Address:	2914 Green Cove Road, Suite AS Huntsville, AL 35803
Place of Organization:	U.S. (Delaware)
Type of Organization:	Limited liability company
Principal Business:	Holding company
Interest Held:	100% ownership interests in ALL.SPACE

Yellowstone Borrower, LLC

Address:	Corporation Trust Company 1209 Orange Street Wilmington, DE 19801
Place of Organization:	U.S. (Delaware)
Type of Organization:	Limited liability company
Principal Business:	Holding company
Interest Held:	100% membership interests in All.Space Holdings, LLC

Yellowstone InterCo Holdings, LLC

Address:	Corporation Trust Center 1209 Orange Street Wilmington, DE 19801
Place of Organization:	U.S. (Delaware)
Type of Organization:	Limited liability company
Principal Business:	Holding company
Interest Held:	100% membership interests in Yellowstone Borrower, LLC

Yellowstone Midco Holdings, LLC

Address:	Corporation Trust Center 1209 Orange Street Wilmington, DE 19801
Place of Organization:	U.S. (Delaware)

[1] See Transaction Description and Public Interest Statement at 3.

Type of Organization:	Limited liability company
Principal Business:	Holding company
Interest Held:	100% membership interests in Yellowstone InterCo Holdings, LLC

York Space Systems Inc.

Address:	6060 S Willow Drive Greenwood Village, CO 80111
Place of Organization:	U.S. (Delaware)
Type of Organization:	Corporation
Principal Business:	Satellite systems
Interest Held:	100% ownership interests in Yellowstone Midco Holdings, LLC

York is a publicly traded company on the New York Stock Exchange (NYSE: YSS). Based on publicly available securities filings and other information available to York, the following individuals and entities own ten percent or more of York's common stock:

BlackRock, Inc.

Address:	50 Hudson Yards New York, NY 10001
Place of Organization:	U.S. (Delaware)
Type of Organization:	Corporation
Principal Business:	Investment management
Interest Held:	~14.0% equity in York Space Systems Inc. (including through subsidiaries and affiliates)

BlackRock, Inc., a publicly traded U.S. company (NYSE: BLK), holds an indirect ownership interest in York through various investment funds and accounts managed by its subsidiaries. To the best of York's knowledge, such interests are held on a passive, investment-only basis.

Pursuant to voting agreements, certain stockholders of York, including each stockholding entity affiliated with BlackRock, Inc., granted York the right to direct the voting of shares of common stock held by such stockholders with respect to the nomination and election of directors of York. York exercises its rights under the voting agreements for the benefit of AE Industrial Partners, LP pursuant to the terms of a Director Nomination Agreement.

AE Industrial Partners, LP

Address:	6700 Broken Sound Pkwy NW Boca Raton, FL 33487
Place of Organization:	U.S. (Delaware)
Type of Organization:	Limited partnership
Principal Business:	Investment management
Interest Held:	~23.7% equity in York Space Systems Inc. (including through subsidiaries and affiliates)

Funds and investment vehicles affiliated with AE Industrial Partners, LP (collectively, the "AE

Investors") hold approximately 23.7% of York's voting equity, although no AE Investor individually holds a ten percent or greater equity interest in York. However, through their share ownership and the voting agreements and Director Nomination Agreement described above, the AE Investors collectively control approximately 74.6% of the voting power for director elections. As a result of this voting power, the AE Investors jointly have the right to designate a majority of the Board of Directors of York; however, no single AE Investor independently holds such right.

The AE Investors' voting and investment authority is exercised through their respective general partners, each of which is managed by AeroEquity GP, LLC. AeroEquity GP, LLC is controlled by its managing members, Michael Greene and David Rowe. Mr. Greene and Mr. Rowe exercise ultimate voting and investment control over the interests in York held through the AE Investors. Mr. Greene and Mr. Rowe are U.S. citizens and can be contacted at the address for AE Industrial Partners, LP listed above.

Officers and Directors of York

The officers and directors of York Space Systems Inc. are listed in the table below, and can be contacted at 6060 S Willow Drive, Greenwood Village, CO 80111.

Name	Title	Citizenship
Dirk Wallinger	Chief Executive Officer President Director	United States
Kevin Messerle	Chief Financial Officer	United States
Monica Palko	Chief Legal & Administrative Officer	United States
Kirk Konert	Chairman of the Board	United States
Tyler Letarte	Director	United States
Tamra Erwin	Director	United States
Reggie Brothers	Director	United States
Andrew Boyd	Director	United States
General (Ret.) James McConville	Director	United States
Janine Davidson	Director	United States