

EXHIBIT 2 — COMPLIANCE WITH NTIA § 8.3.28

Section 8.3.28 of the NTIA *Manual of Regulations and Procedures for Federal Radio Frequency Management* sets out the conditions under which fixed devices re-radiating GPS signals may be operated. The Applicant has designed the proposed installation to meet each of those conditions, and sets out below how each is satisfied.

Condition 1 — Indoor use only; individual authorization for each device at a specific site

All re-radiation will be conducted indoors, at Unit B, 100 Commerce Park Road, North Kingstown, Rhode Island. Authorization is sought for **one device at this single site**. No outdoor re-radiation is proposed.

Condition 2 — XT station class; described as Experimental RNSS Test Equipment

The Applicant requests the **XT** station class. The device is to be used as **Experimental RNSS Test Equipment for the purpose of testing GPS receivers**.

Specifically, it will re-radiate live GNSS signals into an interior assembly and integration area so that receivers installed in autonomous surface vessels under construction can be exercised and verified without removing the vessel from the building. Exhibit 1 describes the intended use in full.

Condition 3 — Entry in the Government Master File

The Applicant understands that an approved assignment will be entered in the GMF and raises no objection.

Condition 4 — Maximum assignment length of two years

A **24-month** term is requested, consistent with this condition.

Condition 5 — Area of potential interference under the control of the user

The premises are a leased unit within a multi-tenant building, so the Applicant addresses this condition explicitly.

The area in which the re-radiated signal could degrade GPS reception is bounded by the range at which that signal is comparable to the direct satellite signal. Beyond that range the direct signal dominates and the re-radiated component behaves as ordinary multipath, which GNSS correlator design rejects. At the requested ceiling that range is **39 ft**; at the configured operating level it is **4 ft**.

The transmit antenna will be located not less than **50 ft from the nearest exterior wall** of the building. The bounding range is therefore contained within the building envelope, and within premises leased and controlled by the Applicant.

Units adjacent to the Applicant's premises are separated by interior demising walls standing 33 ft from the transmit antenna. **These walls extend the full height of the structure to the roof deck**, so the adjacent tenancies are structurally enclosed rather than open above a suspended ceiling. The calculated level at the demising wall is -146.8 dBm, and approximately

–154.8 dBm within the adjacent unit allowing for typical demising construction — some 26 dB below the direct GPS signal level. Those interior spaces have no outdoor GPS reception to degrade.

Condition 6 — Maximum EIRP such that emissions do not exceed –140 dBm/24 MHz at 100 feet

The Applicant requests a ceiling of **–70.58 dBm EIRP (87.5 pW)**, derived from this criterion at a 50 ft transmit-antenna-to-exterior-wall standoff, and demonstrates a worst-case emission of **–81.35 dBm — 10.77 dB below that ceiling**. Calculations are at Exhibit 3, computed on a free-space basis with no allowance for building attenuation.

Condition 7 — Notification of GPS users in the area of potential interference

The Applicant will notify occupants of the premises and adjacent tenants before commencing operation. Given the proximity of Quonset State Airport, written notice will additionally be provided to the airport operator, notwithstanding that the calculated level at that facility is 45.8 dB below the direct GPS signal (Exhibit 4).

Condition 8 — Use limited to testing RNSS equipment and systems

Operation will be limited to testing of RNSS receivers and RNSS-dependent subsystems. The system will not be used as a facility amenity or for general indoor navigation.

Condition 9 — Stop Buzzer point of contact available at all times

The stop-buzzer point of contact is:

Andrew Roy, Vice President, Business Operations **(808) 954-1917** — andrew.roy@havocai.com

Mr Roy is based in the vicinity of the site and can attend the premises in person. He has both the authority and the physical means to de-energize the system immediately, at any time and under any condition, and is reachable at the number above at all times while the system is energized. Contact details are current and will be updated with the Commission if they change.