Exhibit A

Justification for FCC Form 442 – C-Band Aeronautical Mobile Telemetry Authorization

Honda Aircraft Company, Inc. (HACI), an FAA-certified aircraft manufacturer, respectfully submits this justification in support of its application for authorization to operate Aeronautical Mobile Telemetry (AMT) systems in the 5091–5150 MHz band (C-Band), consistent with IRIG 106 standards and NTIA allocation for flight test telemetry.

HACI requires access to additional telemetry spectrum to support developmental flight testing, certification activities, and continued operational safety validation for both current and future aircraft programs. The requested authorization is essential to ensure safe, efficient, and compliant flight test operations, particularly where real-time monitoring of critical aircraft systems is required.

HACI conducts approximately 600 flight test operations annually, with more than 450 operations originating from Piedmont Triad International Airport – Greensboro, NC (KGSO). These activities are supplemented by itinerant operation test flights at remote and specialized test locations in North Carolina, Tennessee, Viginia, South Carolina, Georgia, Florida, Texas, and New Mexico.

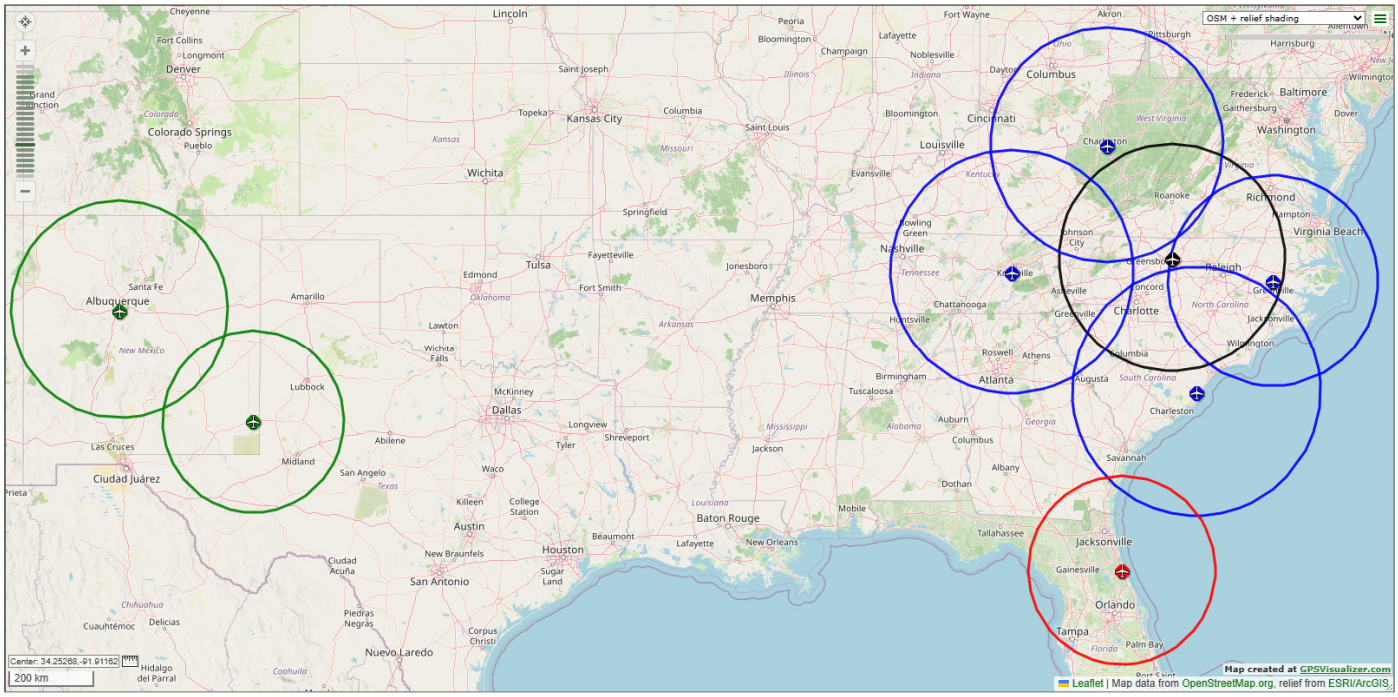

Figure 1 – HACI Telemetry Operating Ranges

Approximately 75% of these flights require real-time telemetry, which is used to:

- Monitor safety-of-flight parameters
- Validate aircraft performance
- Confirm test conditions in real time
- Enable immediate response to anomalies

Existing S-Band telemetry spectrum is no longer sufficient to support HACI's operational demands due to:

- Increased parameters and expanded data rates (including high-fidelity parameters and onboard video)
- Growth in the number of concurrent test aircraft
- Spectrum congestion and interference, specifically from Wireless Communications Service (WCS) encroachment affecting upper S-Band availability

Without access to additional spectrum, HACI's ability to safely conduct flight testing would be significantly constrained, potentially resulting in:

- Reduced flight test efficiency
- Increased program timelines
- Elevated operational risk due to reduced real-time visibility

Exhibit A

Justification for FCC Form 442 – C-Band Aeronautical Mobile Telemetry Authorization

Telemetry is a safety-critical component in flight test operations. It enables real-time monitoring of aircraft performance parameters by ground-based engineering teams, allowing:

- Immediate detection of abnormal conditions
- Rapid decision-making to protect flight crew and aircraft
- Validation of structural, propulsion, and avionics system behavior

In many test scenarios, telemetry serves as the primary independent safety monitoring capability, supplementing onboard instrumentation and pilot awareness.

Loss or degradation of telemetry capability would:

- Reduce situational awareness during critical test conditions
- Limit the ability to identify emerging hazards
- Increase overall flight test risk

The requested C-Band spectrum is therefore essential to maintain an acceptable level of operational safety while supporting increasingly complex aircraft systems and test requirements.

HACI Flight Test Telemetry operation occurs within the defined radii and altitude of the following test locations to accommodate full mission profiles with up to 4 aircraft operating simultaneously at any of the testing locations:

Airport	Reference S-Band License	Location	Radius of Operation	Maximum Operating Altitude	Frequency	Ctr Freq Increment	ERP (Max)	Emissions Designator
KGSO	WQMY247	Greensboro, NC	139 nm	45,000 ft	5098.5 - 5142.5 MHz	0.5 MHz	18	14M0G1D
					5100.5 - 5140.5 MHz			18M0G1D
KPGV	WQYP509	Greenville, NC	130 nm	45,000 ft	5098.5 - 5142.5 MHz	0.5 MHz	18	14M0G1D
					5100.5 - 5140.5 MHz			18M0G1D
KGGE	WQYN754	Georgetown, SC	158 nm	45,000 ft	5098.5 - 5142.5 MHz	0.5 MHz	18	14M0G1D
					5100.5 - 5140.5 MHz			18M0G1D
KTYS	WQYR524	Alcoa, TN	150 nm	45,000 ft	5098.5 - 5142.5 MHz	0.5 MHz	18	14M0G1D
					5100.5 - 5140.5 MHz			18M0G1D
KCRW	WQYQ285	Charleson, WV	139 nm	45,000 ft	5098.5 - 5142.5 MHz	0.5 MHz	18	14M0G1D
					5100.5 - 5140.5 MHz			18M0G1D
KFIN	WQZV253	Palm Coast, FL	124 nm	45,000 ft	5098.5 - 5142.5 MHz	0.5 MHz	18	14M0G1D
					5100.5 - 5140.5 MHz			18M0G1D
KABQ	WQYK303	Albuquerque, NM	135 nm	45,000 ft	5098.5 - 5142.5 MHz	0.5 MHz	18	14M0G1D
					5100.5 - 5140.5 MHz			18M0G1D
KHOB	WRNM815	Hobbs, NM	116 nm	45,000 ft	5098.5 - 5142.5 MHz	0.5 MHz	18	14M0G1D
					5100.5 - 5140.5 MHz			18M0G1D

Bandwidth utilization will vary depending on mission requirements but will remain within authorized limits and be coordinated to minimize interference.

HACI is committed to ensuring non-interference with Federal and non-Federal users operating within the AMT band. The following measures will be implemented;

Technical Controls

- Ability to program Center Frequency for each aircraft enables adjustment to avoid interference
- Transmission bandwidth will be tailored per mission
- ERP levels represent maximum values and will be reduced where feasible
- Power may be distributed across multiple antennas for efficiency

HACI will comply with all required pre-mission coordination procedures, including coordination with:

- Headquarters USAF Frequency Coordinator
- Eastern Area Frequency Coordinator (Patrick AFB)
- White Sands Missile Range (WSMR) AFC
- Regional range spectrum management authorities (Mid-Atlantic, Southeast, Southwest, etc.)

Additional coordination will include:

- Engagement with other licensed commercial operators, as required
- Provision of “Knock-Off / Stop-Buzzer” contacts for all missions
- Adherence to all coordination directives from frequency management authorities

Airspace coordination will continue to be managed through standard FAA flight planning and operational procedures.

Waiver Request – Station Identification (47 CFR §5.115)

HACI respectfully requests a waiver of the station identification requirements under 47 CFR §5.115.

Aeronautical telemetry transmitters used in flight test operations:

- Are not equipped to transmit station identification messages
- Operate within tightly controlled, pre-coordinated environments
- Are tracked and identified through coordination and mission planning processes

Grant of this waiver is consistent with established practice for AMT systems and is necessary to enable effective operation of flight test telemetry equipment.