TRANSACTION DESCRIPTION AND PUBLIC INTEREST STATEMENT

Pursuant to the Federal Communications Commission's ("FCC" or "Commission") rules,[1] Lynk Global, Inc. ("Lynk"); Omnispace LLC ("Omnispace"); and Lunar Holdco, Inc. ("Holdco") (collectively, the "Applicants") request Commission consent to the transfer of control of the FCC licenses ("FCC Licenses") held by Lynk and Omnispace to a new parent company, Holdco (the "Transaction").[2] As discussed more fully herein, grant of the requested transfer of control is consistent with the Commission's rules and will serve the public interest. Accordingly, the Applicants respectfully request expeditious Commission approval of these applications.

I. THE PARTIES

A. Lynk

Lynk is a satellite company that has created a patented, proven, and commercially licensed satellite-direct-to-standard-mobile-phone system. Lynk's technology enables mobile network operators to provide their subscribers with connections from space for their unmodified mobile devices, enabling messaging, voice, and data services designed for both commercial and government applications. Lynk's technology has been tested and proven on all seven continents, and Lynk is partnered with over 50 mobile network operators and has commercial contracts to deliver services to over 50 countries. Indeed, the Commission has previously recognized the public interest benefits of "making [Lynk's] services accessible with the goal of providing connectivity in remote areas during emergencies."[3] A list of Lynk's FCC Licenses and pending applications is provided in Exhibit 1. A diagram of Lynk's current ownership structure is

[1] *See* 47 C.F.R. §§ 25.119, 5.59, 1.9020(j).
[2] *See* Exhibit 1.
[3] *Lynk Global, Inc.*, Order and Authorization, 37 FCC Rcd 10681 ¶ 7 (2022).

provided in Exhibit 2. Lynk is not owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary.[4]

Information about Lynk's 10% or greater stockholders is provided in Exhibit 3. As shown in the exhibit, the pre-closing ownership information for Lynk differs from the ownership information on file with the Commission.[5] Specifically, in June 2024, most of the Simple Agreements for Future Equity (or SAFEs) and notes in the company were converted by their respective holders, which resulted in changes to the list of disclosable interest holders and a reduction in the percentage interest held by Charles Miller, the CEO and board member, from greater than 50% to approximately a 20% voting interest.[6] In July 2025, the parent companies of two investors in Lynk, SES Astra Services Europe Sà.rl and Intelsat Jackson Holdings S.A., completed a business combination.[7] This increased their combined investment in Lynk to greater than 10% equity and voting interests.

To the extent necessary, Lynk requests that the Commission consent to the correction of Lynk's prior ownership information *nunc pro tunc*, as part of this application.

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[4] The Applicants are aware that the Commission adopted new rules for licensee attestations regarding foreign adversary control and provide statements herein about their ownership and control consistent with those new rules. *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).

[5] *See* Application of Lynk Global, Inc., File No. SAT-LOA-20210511-00064 (granted Sept. 16, 2022); *see also* Application of Lynk Global, Inc., File No. SAT-MOD-20241209-00276 (granted Apr. 29, 2025).

[6] For completeness, the following entities held a 10% or greater equity interest and/or voting interest in Lynk and should have been disclosed in the ownership exhibit associated with ICFS File No. SAT-MOD-20241209-00276: Blazar Ventures and related entities ("Blazar"): ~21.67% equity and voting (non-diluted) and ~23.39% equity and voting (fully diluted); Antara Capital Master Fund, LP: less than 10% equity and voting (non-diluted) and ~12.51% equity and voting (fully diluted); Unshackled Ventures and related entities: ~14.46% equity and voting (non-diluted) and less than 10% equity and voting (fully diluted); and Charles Miller: ~19.94% voting and equity (non-diluted) and ~16.36% equity and voting (fully diluted). The following individuals were members of the Lynk board as of that filing: Charles Miller, Mark Foster, Steven Fay, Malon Wilkus, Himanshu Gulati, Tyghe Speidel, Hoyt Davidson, Chetan Bansal, and Ramu Potarazu.

[7] *See 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 (2025) ("*SES-Intelsat Merger Grant*").

B. Omnispace

Headquartered in the Washington, DC area and founded by veteran telecommunications and satellite industry executives, Omnispace is redefining mobile connectivity for the 21st century. By leveraging 5G technologies, the company is combining the global footprint of a non-geostationary orbit satellite constellation with the mobile networks of the world's leading telecom companies to bring an interoperable "one network" connectivity to users and Internet-of-Things ("IoT") devices anywhere on the globe. A list of Omnispace's FCC Licenses is provided in Exhibit 1. A diagram of Omnispace's current ownership structure is provided in Exhibit 2.[8] Omnispace is not owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary.[9]

C. Holdco

A narrative description for the Transaction appears in Section II. After receiving approval for and consummating the Transaction, Holdco will be the direct parent company of Lynk and Omnispace.

II. DESCRIPTION OF TRANSACTION

Pursuant to an Agreement and Plan of Merger by and among Lynk, Omnispace, Holdco, Leo Merger Sub 1, Inc. ("Merger Sub 1"), and Orion Merger Sub 1, LLC ("Merger Sub 2") dated January 30, 2026, the Applicants plan to engage in a multi-step merger process. At closing, Merger Sub 1 and Merger Sub 2 will merge into Lynk and Omnispace, respectively, with Lynk and Omnispace surviving as direct wholly owned subsidiaries of Holdco and remaining as FCC licensees.[10] At this stage, the stockholders of Lynk and the members of Omnispace[11] will receive

[8] Omnispace has not provided 10% or greater stockholder information because it does not hold any Part 25 licenses or authorizations.
[9] *See supra* n.4.
[10] Lynk will remain the applicant for its pending applications.
[11] For this narrative, members and stockholders are used interchangeably.

stock in Holdco in exchange for their respective interests in Lynk or Omnispace. A diagram of the post-closing corporate ownership structure for Holdco is included in Exhibit 2. Information about Holdco's 10% or greater stockholders, officers, and directors is provided in Exhibit 4.

III. THE TRANSACTION WILL SERVE THE PUBLIC INTEREST

For a proposed transfer of control, the Commission conducts a two-step assessment. It first verifies that the applicant has the requisite "citizenship, character, financial, technical, and other qualifications."[12] It then determines whether the transfer will serve "the public interest, convenience, and necessity" by weighing the transaction's public interest benefits and harms.[13]

The Commission should consent to the Transaction because it satisfies both prongs of this two-step review. *First*, the Applicants have the requisite qualifications to hold and transfer licenses.[14] The combined entity will also have the knowledge and capabilities of two operational satellite companies and increased access to resources to invest in the merged company's future operations. *Second*, the Transaction will serve the public interest, convenience, and necessity. It will deliver numerous significant benefits to the public by creating a dynamic and innovative company. Omnispace has years of satellite operational experience and engineering know-how, on-orbit assets, and business experience that will help the combined company accelerate global deployment and scale service delivery to customers. Lynk has a patented, proven, low-cost, multi-spectrum satellite technology platform, which enables backward compatible satellite-delivered mobile voice and messaging services to more than 7 billion smartphones and IoT devices. Leveraging the combined company's assets will enable the offering of transformative

[12] 47 U.S.C. § 308.
[13] *Id.* § 310(d); *see SES-Intelsat Merger Grant* ¶¶ 9-11.
[14] 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. The proposed transfer of control satisfies all applicable provisions of the Communications Act and FCC rules, regulations, and policies (*see, e.g.*, foreign ownership disclosure in Exhibit 5) and will not result in any violation thereof.

data, voice, and messaging services to smartphones and IoT devices, including automotive platforms. Lynk's relationships with over 50 mobile network operator customers across more than 50 countries will see significant benefits from the enhanced direct-to-device offering. Additionally, the Transaction will give Holdco improved access to capital, which will aid the merged company in continuing to develop its novel technology and services, accelerate private sector deployment of advanced satellite services, and improve offerings for both government and private sector customers. Importantly, the Transaction will not create any competitive harms, result in any interruption to services offered by Lynk or Omnispace, or raise any public interest concerns.

IV. ADDITIONAL AND PENDING APPLICATIONS

The list of call signs and file numbers in Exhibit 1 is intended to include all the FCC Licenses and pending applications held by Lynk and Omnispace. However, Lynk or Omnispace may now have on file and may hereafter file additional applications before the Commission acts on the Transaction. Accordingly, the Applicants request that any Commission approval of the transfer-of-control applications include authority for the combined company to acquire control of (i) any additional licenses and authorizations issued to Lynk or Omnispace 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 Lynk or Omnispace and are pending at the time of consummation of the Transaction. Such action would be consistent with prior decisions of the Commission.[15] Following the consummation of the Transaction, any pending applications will

[15] *See, e.g.*, *Intelsat S.A., as Debtor-in-Possession, (Transferor) and New TopCo S.A. (Transferee)*, Order, 37 FCC Rcd 1837 ¶ 15 (2022).

be supplemented as required under the Commission's rules[16] to reflect the new ownership structure.

V. CONCLUSION

For the above reasons, the Applicants respectfully request that the Commission expeditiously consent to the transfer of control of the FCC Licenses.

[16] *See* 47 C.F.R. § 1.65.

Exhibit 1 – FCC Licenses and Applications

FCC Licenses

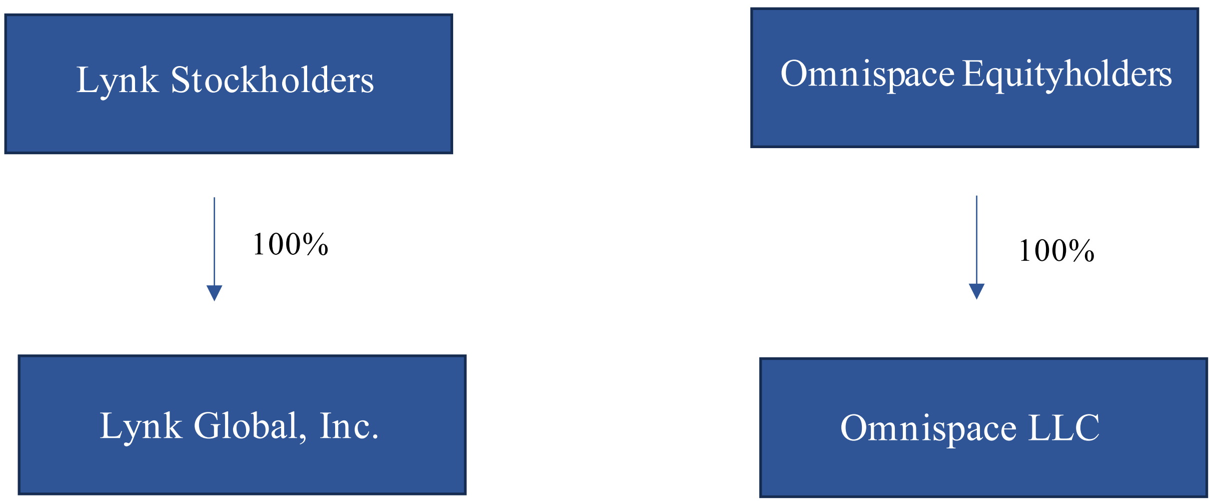
Licensee	Call Sign	Application File Number(s)	Type of FCC Authorization
Lynk	S3087	SAT-MOD-20241209-00276 SAT-MOD-20240108-00006 SAT-MOD-20230824-00210 SAT-LOA-20210511-00064 SAT-STA-20250610-00142	Commercial Satellite
Lynk	E240074	SES-STA-20250829-00621	Earth Station
Lynk	L000061373	0011316969	Cellular Lease
Lynk	L000061374	0011316969	Cellular Lease
Lynk	WM2XLE	0433-EX-CR-2024	Experimental
Lynk	WO2XQD	0808-EX-CR-2024	Experimental
Lynk	WY9XPY	2036-EX-ST-2025	Experimental
Lynk	WA9XGC	1769-EX-ST-2025	Experimental
Lynk	WA9XKT	1770-EX-ST-2025	Experimental
Lynk	WM2XCN	0805-EX-CR-2025	Experimental
Omnispace	WP2XSS	0655-EX-CN-2025	Experimental
Omnispace	WN2XEM	0871-EX-CR-2025	Experimental

FCC Applications

Applicant	Call Sign	Application File Number	Type of FCC Application
Lynk	S3087	SAT-STA-20260106-00010	Special Temporary Authority
Lynk	E240074	SES-LIC-20240502-00944	Commercial Earth Station
Lynk	WP2XZU	0957-EX-CN-2025	Experimental

<u>**Exhibit 2 – Pre and Post-Closing Organizational Charts**</u>

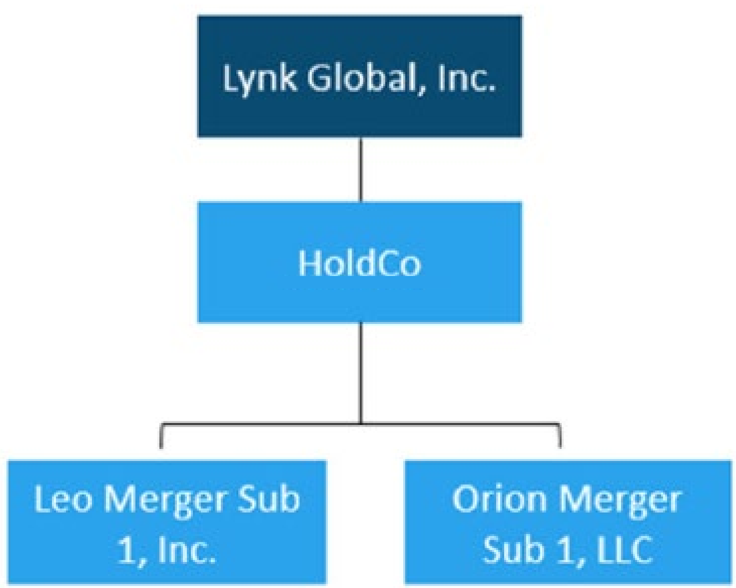
Pre-Closing



Post-Closing

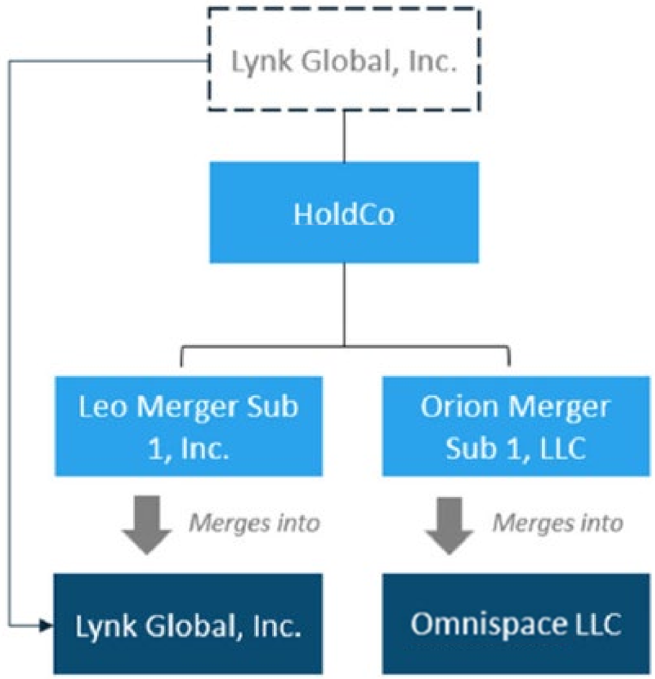
Step 1

- **Formation of Lunar Holdco, Inc with two merger subsidiaries**



Step 2

- **Leo Merger Sub 1, Inc. merges into Lynk Global, Inc.**
- **Orion Merger Sub 1, LLC merges into Omnispace LLC**



Step 3

- **Lynk and Omnispace shareholders receive Lunar Holdco, Inc. stock**

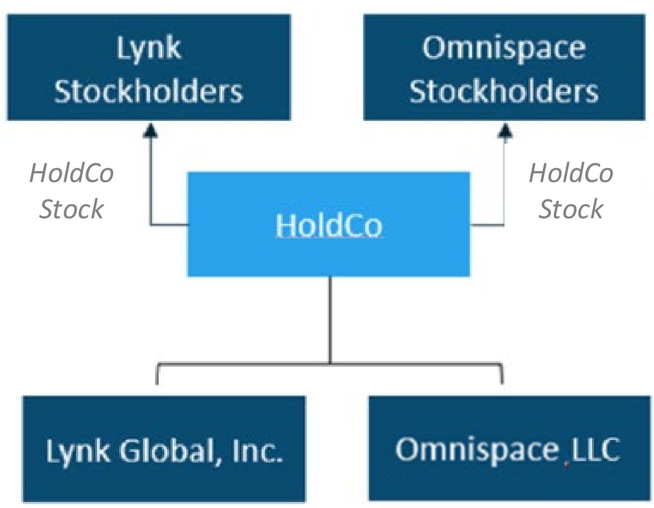


Exhibit 3 – Lynk Pre-Closing Ownership Information

The current 10% or greater stockholders in Lynk are provided below:

Blazar UL LLC and Blazar Ventures LLC
Address: 106 N Lee Street Alexandria, VA 22314
Place of Organization: United States
Principal Business: Venture Capital
Interest Held: The combined equity and voting interest is ~16.0% (fully diluted) and ~22.7% (undiluted). Blazar UL LLC has ~14.0% (fully diluted) and ~22.7% (undiluted) equity and voting interest. Blazar Ventures LLC has no equity and voting interest (undiluted) and ~2.1% equity and voting interest (fully diluted). Blazar Ventures GP, LLC is the manager of Blazar U LLC. Blazar Ventures LLC and Blazar Ventures GP LLC are owned equally by Mark Foster, Robert Poulin, and Jeff Ganek. Mr. Foster, Mr. Poulin, and Mr. Ganek are U.S.A. citizens.

Antara Capital Master Fund, LP
Address: 224 W 35th St., Ste. 500 #2165 New York, NY 10001
Place of Organization: Cayman Islands
Principal Business: Venture Capital
Interest Held: The equity and voting interest is ~15.6% (fully diluted) and <10% (undiluted). Himanshu Gulati is the General Partner ("GP") and controls Antara Capital Master Fund LP. Mr. Gulati is a U.S.A. citizen.

SES Astra Services Europe Sà.rl and Intelsat Jackson Holdings S.à r.l.
Address: Château de Betzdorf, L-6815, Betzdorf, Grand Duchy of Luxembourg
Place of Organization: Luxembourg
Principal Business: Satellite Communications
Interest Held: The combined equity and voting interest is ~15.4% (fully diluted) and ~13.2% (undiluted). SES Astra Services Europe Sà.rl has ~10.1% (fully diluted) and ~7.1% (undiluted) equity and voting interest. Intelsat Jackson Holdings S.à r.l. has ~5.2% (fully diluted) and ~6.1% (undiluted) equity and voting interest. The SES ownership structure is a matter of record in another FCC proceeding and is incorporated by reference.[1]

Charles Miller
Address: 5425 Wisconsin Avenue, Suite 801, Chevy Chase, MD 20815
Nationality: United States
Interest Held: The equity and voting interest is <10% (fully diluted) and ~15.6% (undiluted).

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[1] *See SES-Intelsat Merger Grant*; *see also* SB Docket No. 24-267.

Exhibit 4 – Post-Closing Ownership, Officers, and Directors[1]

Ownership Information

Upon consummation of the Transaction, the entities listed below will have 10% or greater equity and/or voting interest in Lynk Global, Inc. and Omnispace LLC:[2]

Lunar Holdco, Inc.
Address: 5425 Wisconsin Avenue, Suite 801, Chevy Chase, MD 20815
Place of Organization: United States
Principal Business: Satellite Communications
Interest Held: 100% equity and voting interest in both Lynk Global, Inc. and Omnispace LLC.

SES Astra Services Europe Sà.rl, Intelsat Jackson Holdings S.à r.l., and Intelsat US 2 LLC
Address: Château de Betzdorf, L-6815, Betzdorf, Grand Duchy of Luxembourg
Place of Organization: Luxembourg
Principal Business: Satellite Communications
Interest Held[3]*:* The combined equity and voting interest will be ~11.4% (fully diluted) and ~14.9% (undiluted). Each of these entities will have <10% equity and voting interest (fully diluted and undiluted). SES Astra Services Europe Sà.rl will own ~6.7% (fully diluted) and ~8.8% (undiluted) equity and voting interest. Intelsat Jackson Holdings S.à r.l. will own ~3.6% (fully diluted) and ~4.7% (undiluted) equity and voting interest. Intelsat US 2 LLC will own ~1.1% (fully diluted) and ~1.4% (undiluted) equity and voting interest. The SES ownership structure is a matter of record in another FCC proceeding and is incorporated by reference.[4]

Antara Capital Master Fund, LP
Address: 224 W 35th St., Ste. 500 #2165 New York, NY 10001
Place of Organization: Cayman Islands
Principal Business: Venture Capital
Interest Held: The equity and voting interest is ~7.7% (fully diluted) and 10.0% (undiluted). Himanshu Gulati is the GP and controls Antara Capital Master Fund LP. Mr. Gulati is a U.S.A. citizen.

Columbia Capital Equity Partners V (QP), L.P. and Columbia Omni V, LLC
Address: 204 S. Union Street, Alexandria, VA 22314
Place of Organization: United States
Principal Business: Venture Capital

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[1] Lynk is in the process of raising funds and will update this proceeding if there are any substantial changes to disclosable interest holders. *See* 47 C.F.R. § 1.65.
[2] For the Commission's awareness, CF OM Space, LLC currently holds less than a 10% combined equity and voting interest in Omnispace LLC. CF OM Space, LLC or one of its affiliates is considering an additional investment that could result in CF OM Space, LLC or one of its affiliates becoming a 10% or greater equity and/or voting interest holder. The Applicants will supplement this exhibit as necessary to disclose the final 10% or greater interest holders that may be added prior to the Commission's approval of the transaction.
[3] Undiluted amounts reflect current capitalization. Diluted amounts assume the issuance of additional equity in connection with future financing.
[4] *See SES-Intelsat Merger Grant*; *see also* SB Docket No. 24-267.

Interest Held: The combined equity and voting interest will be ~9.9% (fully diluted) and ~13.0% (undiluted). Each of these entities will have <10% equity and voting interest (fully diluted and undiluted). Columbia Capital Equity Partners V (QP), L.P. will own ~6.5% (fully diluted) and ~8.4% (undiluted) equity and voting interest. Columbia Omni V, LLC will own ~3.5% (fully diluted) and ~4.6% (undiluted) equity and voting interest. The GP for Columbia Capital Equity Partners V (QP) is Columbia Capital Equity Partners V, L.P., whose manager and GP, in turn, is Columbia Capital V, LLC. James B. Fleming, Jr. and John T. Siegel, Jr. are 50/50 managing members of Columbia Capital V, LLC. Mr. Fleming and Mr. Siegel are both U.S.A. citizens.

Telcom Omnispace LLC
Address: 701 Brickell Avenue, 17th Floor, Miami, FL 33131
Place of Organization: United States
Principal Business: Venture Capital/Private Equity
Interest Held: The equity and voting interest will be ~10.1% (fully diluted) and ~13.2% (undiluted). Telcom Omnispace LLC ("Telcom") is controlled by two individuals, Dr. Rajendra Singh and Neera Singh, who control ~62% directly through equity interest and ~36% indirectly through three trusts (the Rajendra Singh 2010 Grantor Retained Annuity Trust II (~20%), the Rajendra Singh 2011 Florida Trust For The Benefit of Hersh Raj Singh (~8%), and The Rajendra Singh 2011 Florida Trust For The Benefit of Samir Raj Singh (~8%)). Dr. Rajendra and Neera Singh are either the trustees or grantors for all trusts. The Singhs are U.S.A. citizens. No other persons or entities within Telcom will have a >10% equity and/or voting interest in Holdco.

Directors and Officers

The officers and directors of Holdco are listed below, and the address for each is 5425 Wisconsin Avenue, Suite 801, Chevy Chase, MD 20815.

Directors

Name	Title	Nationality
Ramu Potarazu	Chairman of the Board; Director	U.S.A.
Ram Viswanathan	Director	U.S.A.
Rajendra Singh	Director	U.S.A.
Greg Orton	Director	Ireland
Nihar Shah	Director	U.S.A.
Monish Kundra	Director	U.S.A.
Gary Parsons	Director	U.S.A.
Mark Foster	Director	U.S.A.
Vacant	Director	TBD

Officers

Name	Title	Nationality
Ramu Potarazu	Chief Executive Officer	U.S.A.

Name	Title	Nationality
Ram Viswanathan	Chief Strategy Officer	U.S.A.
Steven Fay	Chief Financial Officer	U.S.A.
Amit Saluja	Chief Business and Corporate Development Officer	U.S.A.
Tyghe Speidel	Chief Technology Officer	U.S.A.
Dan Dooley	Chief Commercial Officer	U.S.A.
Geoff Willard	General Counsel; Chief Legal Officer	U.S.A.
Amy Mehlman	EVP & Chief Global Affairs Officer	U.S.A.
Chris Keenan	EVP, Program Management	U.S.A.

Exhibit 5 – Foreign Ownership

Question 33 of Form 312 asks whether the applicant is a corporation of which more than 25% of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country. The question is intended to ascertain whether the applicant complies with Section 310(b)(4) of the Communications Act (47 U.S.C. § 310(b)(4)), which establishes a 25% limit on foreign ownership for companies controlling the licensees of broadcast, common carrier, aeronautical en route, and aeronautical fixed licenses. Section 310(b)(4) is inapplicable here because Lynk's satellites are not aeronautical en route or aeronautical fixed stations and are not used to provide broadcast or common carrier service.