

DATE :

To: Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD

SUBJECT : Request for Limited Modular Approval for FCC ID : 2BML6P2EV3-0

To Whom It May Concern:

Pursuant to 47 C.F.R. § 15.212(b), Zipline International Inc. hereby respectfully requests Limited Modular Approval for the transmitter module with FCC ID 2BML6P2EV3-0. This module is intended solely for integration into a single, specifically identified host platform, Platform 2 EV3, for which it was expressly designed. The module is not intended for general integration into multiple host devices, for third-party integration, or for installation or use outside the host configuration described in this application.

The Applicant also respectfully requests **long-term confidentiality** for the **Operational Description**, including the **Block Diagram, Theory of Operation, Schematics, Internal Photos, and Installation Instructions**, pursuant to **47 C.F.R. § 0.459** and **KDB 726920 D01**. These materials contain detailed proprietary technical information regarding the design, architecture, integration, and operation of the subject module and host implementation, the public disclosure of which would reveal confidential trade secrets and competitively sensitive information. For the reasons reflected in this request and the controlled, non-public nature of the host platform and installation environment described herein, the Applicant submits that long-term confidential treatment of these exhibits is warranted.

The request for Limited Modular Approval is appropriate because, although the module satisfies the other applicable conditions for modular approval, it does not satisfy the antenna condition applicable to full modular approval under 47 C.F.R. § 15.212(a). Specifically, the antenna connection is neither permanently attached nor implemented through a unique antenna coupler of the type contemplated for a full modular approval. The absence of a permanent or unique antenna coupling does not create any practical risk of uncontrolled antenna substitution in this case, however, because the module is confined to a single OEM-controlled host implementation and is not distributed for general integration use.

More particularly, the module is designed exclusively for installation in Platform 2 EV3 and only with the antenna system, cable assembly, connector arrangement, installation method, placement, and operating environment evaluated in connection with this filing. The host platform is not available or accessible to the public, the host software is

designed to prevent unauthorized access or control, and the host and installed module are maintained only by Zipline-employed, FAA Part 135-certified aircraft maintenance technicians operating under the Applicant's control. The module will not be offered for standalone sale or for integration into unspecified host platforms. The Applicant's integration instructions will expressly identify the permitted host platform and the compliance-critical installation parameters, and any deviation from those approved conditions will require further regulatory evaluation and, where necessary, a permissive change or a new authorization.

Accordingly, although full modular approval is not sought and would not be appropriate here, the Applicant submits that Limited Modular Approval is warranted because compliance has been demonstrated for the specific operating conditions under which the transmitter will be used, and because the Applicant maintains sufficient control over the end product and installation conditions to ensure that the final product, as marketed, installed, and maintained, remains compliant with the Commission's rules.

The supporting exhibits submitted with this application, including the test report(s), operational description, antenna and integration information, and related compliance materials, establish that the module complies when installed and operated in its intended and controlled host environment.

For the foregoing reasons, Zipline International Inc requests that the Commission grant Limited Modular Approval for this transmitter module pursuant to 47 C.F.R. § 15.212(b) and Long Term Confidentiality for the Operational Description pursuant to 47 C.F.R. § 0.459 and KDB 726920 D01.

Respectfully submitted,

Gregorio Lopes

Gregorio Lopes (01 May, 2026 20:05:58 UTC)

Gregorio Lopes

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TIMEZONE	UTC

CONTRACT HISTORY



SENT

Sent for Signature to **Gregorio Lopes** (greg.lopes@flyzipline.com) by **Billy Tipp** (billy.tipp@flyzipline.com).

01 May, 2026 19:57:40 UTC
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SIGNED

Signed by **Gregorio Lopes** (greg.lopes@flyzipline.com).

01 May, 2026 20:05:56 UTC
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EXECUTED

This document has been signed and executed by all parties.