



July 2, 2024

VIA ELECTRONIC FILING

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Section 2.929(d) Notification
Transfer of Certifications Issued Under Grantee Code “QFS”
From Dynetics, Inc. to Observation Without Limits, LLC

Dear Ms. Dortch:

Pursuant to Section 2.929(d) of the Commission’s rules, the Commission is hereby notified of the transfer of responsibility for all equipment authorization grants under Grantee Code QFS from Dynetics, Inc. (“Dynetics”) to Observation Without Limits, LLC (“OWL”).

This Notification is submitted in light of the fact that as of July 1, 2024, OWL and its employees assumed responsibility from Dynetics for management, operations and compliance associated with the equipment authorized under Grantee Code QFS.¹

The New Grantee OWL will assume and ensure responsibility for continued compliance of the equipment marketed under Grantee Code QFS.

The new address and POC information for the New Grantee OWL will be :

Mailing Address: Observation Without Limits, LLC PO Box 18951 Huntsville, AL 35804	POC: Thomas Gates, VP of Business Operations PO Box 18951 Huntsville, AL 35804 256-651-3441; tom.gates@owlknows.com
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¹ As of July 1, 2024, the Dynetics employees previously responsible for the sale and technical support of the QFS Radars and for the tracking, maintenance and compliance of the QFS Certifications – will become employees of OWL. Therefore, as of July 1 OWL employees will be responsible for the sale and technical support of the QFS Radars and for the tracking, maintenance and compliance of the QFS Certifications. OWL - as an entity – will become responsible for compliance with FCC rules governing the QFS Certifications.

Certifications Required Pursuant to Paragraph 68 of FCC 22-84² and 47 CFR 2.929(d)

Attached to this Notification is the signed certification of Observation Without Limits, LLC, confirming that, as of the date of the filing of this Notification:

- (i) The equipment to which the transaction described herein applies is not prohibited from receiving an equipment authorization pursuant to § 2.903; and
- (ii) The New Grantee Observation Without Limits, LLC is not identified on the Covered List (and is not a subsidiary or affiliate of an entity named on the Covered List), established pursuant to §1.50002 of this chapter, as an entity producing covered communications equipment.

Certification Required Pursuant to 47 CFR 2.929(d) and 2.911(d)(7)

Also attached to this Notification is a signed certification designating an agent located in the United States for the purpose of accepting service of process on behalf of the New Grantee Observation Without Limits, LLC.

Respectfully submitted,

For: Observation Without Limits, LLC



Name: Thomas Gates
Title: VP of Business Operations
Address: PO Box 18951, Huntsville, AL 35804
Tel: 256-651-3441
Email: tom.gates@owlknows.com

² Protecting Against National Security Threats to the Communications Supply Chain through the Equipment Authorization Program, ET Docket No. 21-232, EA Docket No. 21-233, Report and Order, Order, and Further Notice of Proposed Rulemaking, ¶68 (“Report and Order”).



Certifications Required Pursuant to FCC 22-84 and 47 CFR 2.929(d)

Pursuant to Paragraph 68 of FCC 22-84 and 47 CFR 2.929(d), Observation Without Limits, LLC hereby certifies that, as of the date of the filing of the foregoing Notification:

- (i) The equipment to which the transaction described in the foregoing Notification applies is not prohibited from receiving an equipment authorization pursuant to § 2.903; and
- (ii) The New Grantee Observation Without Limits, LLC is not identified on the Covered List (and is not a subsidiary or affiliate of an entity named on the Covered List), established pursuant to §1.50002 of this chapter, as an entity producing covered communications equipment.

By: Observation Without Limits, LLC

Name: Thomas Gates
Title: VP of Business Operations
Address: PO Box 18951, Huntsville, AL 35804
Tel: 256-651-3441
Email: tom.gates@owlknows.com

Date: July 2, 2024



July 2, 2024

Certification Required Pursuant to 47 CFR 2.929(d) and 2.911(d)(7)

Designation of Agent Located in the United States
For the Purpose of Accepting Service of Process
Grantee Code: QFS

In light of the transactions described in the foregoing Notification resulting in the change of name of the Grantee for Grantee Code QFS to Observation Without Limits, LLC, this certification is provided pursuant to 47 CFR 2.929(c):

Observation Without Limits, LLC's designated agent ("Agent") for the purpose of accepting service of process in the United States for matters related to the applicable equipment is as follows:

Agent: Observation Without Limits, LLC
FRN: 0035498914
POC: Joel Simoneau
Address: 355 Quality Circle, Huntsville, AL 35806
Email: Joel.simoneau@owlknows.com
Tel: 256-744-4514

- Observation Without Limits, LLC and Agent consent to and acknowledge the Agent's obligation to accept service of process in the United States for matters related to the applicable equipment, and at the physical U.S. address and e-mail address of the Agent; and
- Observation Without Limits, LLC acknowledges its acceptance of its obligation to maintain an agent for service of process in the United States for no less than one year after either the grantee has permanently terminated all marketing and importation of the applicable equipment within the U.S., or the conclusion of any Commission-related administrative or judicial proceeding involving the equipment, whichever is later.

Grantee: Observation Without Limits, LLC

Name: Thomas Gates
Title: VP of Business Operations
Address: PO Box 18951, Huntsville, AL 35804
Tel: 256-651-3441
Email: tom.gates@owlknows.com
Date: July 2, 2024



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- (i) The equipment to which the transaction described in the foregoing Notification applies is not prohibited from receiving an equipment authorization pursuant to § 2.903; and
- (ii) The New Grantee Observation Without Limits, LLC is not identified on the Covered List (and is not a subsidiary or affiliate of an entity named on the Covered List), established pursuant to §1.50002 of this chapter, as an entity producing covered communications equipment.

By: Observation Without Limits, LLC

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