



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
Office of Space Commerce  
Commercial Remote Sensing Regulatory Affairs Division  
Silver Spring, MD 20910

February 13, 2024

Mr. Matthew McGovern  
Senior Project Engineer  
NOVI, LLC.  
2800 Shirlington Road, Suite 704  
Arlington, VA, 22206

via: [matt.mcgovern@novillc.com](mailto:matt.mcgovern@novillc.com)

**RE: NOAA Commercial Remote Sensing Regulatory Affairs License Inquiry**

Dear Mr. McGovern:

Pursuant to 15 CFR § 960.5(a), the National Oceanic and Atmospheric Administration's (NOAA) Commercial Remote Sensing Regulatory Affairs (CRSRA) division of the Office of Space Commerce, has reviewed your license application, submitted on February 7, 2024, concerning your proposed LIME private remote sensing space system. Under the authority of the Secretary of Commerce under 51 U.S.C. § 60121 *et seq.* and 15 CFR Part 960, delegated to NOAA, we have determined that the proposed system as described in your license application does not fall within the Secretary's jurisdiction and therefore will not be required to apply for a NOAA license. This determination was made based on the fact that your system's remote sensing instruments are a navigation instrument and an attitude control instrument; therefore, they are used primarily for mission assurance purposes and are exempt from the licensing requirement under 15 C.F.R. § 960.2(b).

If the factual circumstances of the information provided change, please submit a new Initial Contact Form, as you may be subject to the Secretary's jurisdiction. Additionally, please contact CRSRA with any future systems you may plan to operate in order to obtain a licensing determination on that specific system and its mission.

Please refer any questions regarding this determination to Frank Rostan at 301-520-5202 or by email at [CRSRA@noaa.gov](mailto:CRSRA@noaa.gov).

Sincerely,

Sarah C. Brothers, Ph.D.  
Director, Commercial Remote  
Sensing Regulatory Affairs

cc: Glenn Tallia, NOAA GC

