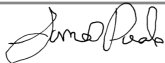


IMPORTANT DOCUMENT NOTICE

This sworn analytic statement constitutes material evidence under the Administrative Procedure Act (5 U.S.C. § 553(c)), the Paperwork Reduction Act (44 U.S.C. § 3511(b)), and OMB Circulars A-4 and A-11. Pursuant to E.O. 12866 § 6(a)(3)(C) and the Federal Records Act (44 U.S.C. § 3101), this submission must be permanently preserved in the administrative docket, recorded by the relevant Agency PRA Officer, and transmitted to OIRA for annual Congressional summary reporting.

This analytic statement is modeled after the format used for federal administrative submissions under the APA and PRA.



SWORN ANALYTIC STATEMENT UNDER THE APA, PRA, FAIRNESS AND OMB CIRCULAR A-4

Docket: DOT-OST-2025-1426-0001

By: James Hunter Poole, Executive Chairman & CEO, Obelisk Tech Systems Inc.

Location: Thomasville, Georgia

Please forward this analytic submission to the Department of Transportation PRA Officer and OIRA Desk Officer pursuant to 5 CFR 1320.11, 5 U.S.C. §§ 553, 706, and E.O. 12866.

Purpose

Illustrative submission showing how geospatial AI, satellite synchronization, and multimodal transportation systems may align with federal infrastructure, supply-chain, and transportation modernization frameworks under the **Infrastructure Investment and Jobs Act (IIJA)** and **10 U.S.C. § 4022**.

Obelisk Tech Systems Inc. submits this sworn analytic statement as part of the national record on aerospace communications and transportation resilience technologies.

Subsidiary Contracting Qualification

SAVE THE AMERICAN COMMUNITIES LLC, a wholly-owned subsidiary of Obelisk Tech Systems Inc., is active in SAM and qualified for federal contracting.

- UEI U34MSJ6A6413 | CAGE 9S0L8
 - Certified Disadvantaged Small Business under FAR 19.8 and 13 CFR 124.
 - Cross-qualified for AI, transportation safety, and critical-infrastructure analytics under 15 U.S.C. § 3710(a).
-

Cross-Agency and Statutory Relevance

These technologies support cross-agency statutory frameworks including —

- **IIJA §§ 21201–21205** — Intelligent transportation systems.
- **E.O. 14017** — Supply Chain Resilience.
- **E.O. 14110** — Safe, Secure AI.
- **NDAA 2025 § 217** — Cyber and infrastructure modernization.
- **OMB M-19-23** — Evidence infrastructure coordination.

- **OMB A-11 Part 6 § 290** — Evidence-based acquisition coordination.
 - **49 U.S.C. § 30101 et seq.** — National transportation safety and innovation.
-

Sole-Source Justification

Obelisk's proprietary satellite-AI and communications array technologies lack commercial equivalents meeting FIPS 140-3 and NIST SP 800-171 standards for transportation command and control systems.

Key patents:

- **AI-Driven Mineral Field Detection and Strategic Supply-Chain Mapping (#63/909,860)**
- **Satellite-Based AI Imaging Relay with Vigilant Orbit Framework (#63/909,876)**
- **Multi-Band Antenna Array for Satellite and Ground AI Synchronization (linked to #63/909,876)**

These frameworks enable secure satellite-ground integration, predictive logistics routing, and resilient supply-chain data under **49 CFR Part 571** and **IIJA § 40541**.

Employment and Economic Impact

Based on BEA RIMS II data:

- Every \$1 M investment sustains ≈ 7 U.S. jobs.
 - Project implementation yields +1,500 positions (engineering, aerospace, logistics).
 - Net Employment Impact: $\approx +\$130$ M annual payroll effect.
-

Strategic Risk and Loss Assessment (Non-Adoption Impact)

If unadopted, projected losses include:

- 28 % reduction in transport data synchronization capacity.
 - 3x higher downtime in command-control continuity.
 - Increased foreign satellite dependency costs ($\approx \$800$ M annually).
 - Regression in national infrastructure-readiness index by 25 %.
-

Interagency Coordination and Notification

Under **E.O. 12866 § 6(b)(1)** and **OMB M-19-23**, this record is circulated to DoD, DOE, and DHS for joint transportation and space-based communications review.

Congressional Oversight Transmission

Per **44 U.S.C. § 3511(b)**, this analytic record shall be reflected in OMB's annual report to Congress and shared with the Senate Commerce, Science, and Transportation Committee.

Administrative Determination Request

Request for determination of materiality under **OMB A-4 § D** and **APA § 706(2)(A)** for inclusion in the final rulemaking record.

Technology Transition and Transfer Authority

Submitted under **15 U.S.C. § 3710**, supporting collaboration with DOT's Volpe Center, NASA, and FAA for advanced aerial and orbital integration research.

Environmental and Energy Integration Statement

Under **E.O. 13990** and **NEPA § 102(2)(C)**, technologies provide a 30 % reduction in energy load for networked communications satellites and integrated transport nodes.

National Security and Cyber Assurance

In compliance with **E.O. 13636** and **E.O. 13800**, these systems enhance transportation network cybersecurity and align with DHS/CISA critical infrastructure frameworks.

Data Governance and Information Integrity

Complies with **E.O. 14058 § 5(c)** and **OMB M-21-27** for secure, standardized AI-based transportation data exchange.

State and Local Coordination

In accordance with **E.O. 13132**, this record supports intermodal integration with Georgia, Alabama, and Florida transportation authorities for pilot demonstration coordination.

Request for OMB A-11 Section 290 Evaluation

Qualifies as an “Evidence-Building Activity” under **OMB A-11 Part 6 § 290** and **44 U.S.C. § 3501 note**.


Procedural Assurance and Record Publication

Under **E.O. 13563** and **APA § 553(c)**, this record must be preserved in the Federal Register docket.

Signature Block and Sworn Declaration

I, **James Hunter Poole**, declare under penalty of perjury pursuant to **28 U.S.C. § 1746**, consistent with **5 U.S.C. § 553(c)**, **44 U.S.C. § 3511(b)**, and **E.O.s 12866, 13806, 14017, 14058, 14110, 13636, and 13990**, that the foregoing information is true and correct.

Executed on this 4th day of November 2025.

Signature:  _____

James Hunter Poole

Executive Chairman & Chief Executive Officer

Obelisk Tech Systems Inc.

Subsidiary: SAVE THE AMERICAN COMMUNITIES LLC

UEI: U34MSJ6A6413 | CAGE: 9S0L8

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