



October 28, 2025

Record of Categorical Exclusion for AP774431XX - CesiumAstro Inc. – Satellite Manufacturing Project

Description of Categorically Excluded Action:

The Export-Import Bank of the United States (“EXIM”) is considering whether to issue a direct loan under the Make More in America initiative to CesiumAstro Inc. (“CesiumAstro” or “the Company”) for the production of satellites and satellite components at an existing facility in Bee Cave, Texas. This loan would finance the purchase of the facility, infrastructure enhancements, and equipment purchase and installation within the facility, for the express purpose of producing the satellites and satellite components.

The purpose of the Make More in America Initiative is to finance domestic projects and facility upgrades in the United States that directly support U.S. jobs through exports.

Project Description:

CesiumAstro Inc. was founded in 2017 and specializes in phased array technology, building antennas and communications systems for satellites. EXIM funds will allow CesiumAstro to purchase the West Austin Business Park in Bee Cave, Texas, a 269,959 square foot facility that includes three (3) Class A logistics buildings on an existing campus. The buildings are currently empty warehouses, so the Company proposes infrastructure improvements to cover HVAC, insulation, electrical connections, door inserts, security systems, guard shacks, and other necessary internal improvements for offices, assembly, test, and integration activities in the three buildings at the facility. Additional machinery / Capex will include power racks, spacecraft-level shakers, industrial compressors, soldering, Unit-Level Thermal Cycling Chambers, and other equipment used to manufacture satellites and satellite components.

There will be no major structural alterations to the buildings. All infrastructure improvements are minor and will be completed within the existing campus in Bee Cave, Texas.

The proposed fund will be used to improve CesiumAstro’s efficiency by expanding operations, ensuring scaled production volumes and a streamlined manufacturing processes to meet rising demand for high-volume satellite and payload constellations with reliable, high-quality deliveries. The satellites will be sold both domestically and internationally. With this new building, equipment, and infrastructure improvements, the proposed direct loan is expected to support the creation of 400 high-quality U.S. jobs at CesiumAstro.

EXIM determined that the CesiumAstro transaction is not an undertaking under the National Historic Preservation Act and that Section 106 consultation is *not* required.

The environmental and social screening determined that the activities associated with the direct loan have minimal potential to adversely affect any physical, biological, or socio-cultural resources in or around the vicinity of the facility.

**Number and Title of Categorical Exclusion:**

The actions that would be taken pursuant to the proposed direct loan for CesiumAstro are consistent with and are covered by the Department of Energy Categorical Exclusions, B1.15, B1.31, B2.1, and B2.2, adopted by EXIM. The text of the categorical exclusions are as follows:

B1.15 Support buildings:

Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities.

B1.31 Installation or relocation of machinery and equipment:

Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts.

B2.1 Workplace enhancements:

Modifications within or contiguous to an existing structure, in a previously disturbed or developed area, to enhance workplace habitability (including, but not limited to, installation or improvements to lighting, radiation shielding, or heating/ventilating/air conditioning and its instrumentation, and noise reduction).

B2.2 Building and equipment instrumentation:

Installation of, or improvements to, building and equipment instrumentation (including, but not limited to, remote control panels, remote monitoring capability, alarm and surveillance systems, control systems to provide automatic shutdown, fire detection and protection systems, water consumption monitors and flow control systems, announcement and emergency warning systems, criticality and radiation monitors and alarms, and safeguards and security equipment).

Regulatory Requirement

The proposed direct loan and related actions described above were subject to environmental and social screening by EXIM Staff to ensure they are consistent with the specific category of actions



contained in the categorical exclusion adopted by EXIM, including the extraordinary circumstances of [18 CFR 1318.201](#). To ensure the requirements of the categorical exclusion were met, EXIM's Engineering and Environment Division staff reviewed numerous project related documents between May 2025 and October 2025 and participated in several calls with CesiumAstro staff to better understand the scope of work and the manufacturing process. In August 2025, Office of Board Authorized Finance (OBAF) staff, including two loan officers and an engineer, visited the currently operating CesiumAstro facilities in Bee Cave, Texas as part of the due diligence review of the pending transaction. OBAF staff also visited the new campus to be financed, also in Bee Cave, Texas.

The Comment section below is provided for any necessary clarifications concerning the details listed above. Signature by CesiumAstro's designated representative in the Corporate Validation Section is an indication of CesiumAstro's material concurrence with the details described in this memorandum and in the determination presented below.

Comment: _____

Corporate Validation:

Name and Title (Print): Kenneth Smith, CFO

Signature: *Kenneth Smith*

Date: October 28, 2025

**Determination:**

Based on review of information submitted and in the possession of EXIM Bank concerning the actions associated with the proposed MMIA direct loan described above, I have determined that the actions involve no extraordinary circumstances and fit within the specified category of actions in Categorical Exclusions B1.15, B1.31, B2.1, and B2.2, adopted by EXIM described above, and are hereby categorically excluded from further review under the National Environmental Policy Act (42 USC 4321, as amended).

Date: 10/28/2025

M. Tiffin Caverly
Vice President, Engineering & Environment