

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Axon Enterprise, Inc. and Dedrone Holdings, Inc.

Petitioners,

v.

Airspace Defense, Inc.

Patent Owner

Case No. IPR2025-00525

U.S. Patent No. 10,713,959

PATENT OWNER'S NON-CONTINGENT REVISED MOTION TO AMEND

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List of Patent Owner Exhibits

Exhibit No.	Description
EX2001	PCT Request, International (PCT) Application No. PCT/US16/37071, filed on June 10, 2016
EX2002	PDF Copies of MPEP Editions and Revisions 1948 – 2023, https://www.uspto.gov/web/offices/pac/mpep/old/index.htm .
EX2003	Chapter 200 Types, Cross-Noting, and Status of Application, Manual of Patent Examining Procedure (MPEP) (1994)
EX2004	Chapter 200 Types and Status of Application; Benefit and Priority Claims, Manual of Patent Examining Procedure (MPEP) (2018)
EX2005	J. Ablon (Airmap), “Remote Identification,” https://www.icao.int/Meetings/UAS2017/-Documents/Jared%20Ablon_Stream%20A.pdf .
EX2006	Recommendation ITU-T X.509 (2016)
EX2007	P. Syverson, “A Taxonomy of Replay Attacks [cryptographic protocols],” Proceedings of the Computer Security Foundations Workshop VII, pp. 187-191 (1994), doi: 10.1109/CSFW.1994.315935.
EX2008	A.M. Espinoza, W.J. Tolley, and J.R. Crandall, “Alice and Bob, Who the FOCI Are They?: Analysis of End-to-End Encryption in the LINE Messaging Application,” 7th USENIX Workshop on Free and Open Communications on the Internet (FOCI 17) (2017), https://www.usenix.org/system/files/conference/foci17/foci17-paper-espinoza.pdf .

Exhibit No.	Description
EX2009	M.A. Harris and K. Patten, “Mobile Device Security Considerations for Small-and Medium-Sized Enterprise Business Mobility,” INFORMATION MANAGEMENT & COMPUTER SECURITY 22(1) 97-114 (2014), https://www.researchgate.net/profile/Mark-Harris-10/publication/263245514_Mobile_device_security_considerations_for_small-and_medium-sized_enterprise_business_mobility/links-5697cc4108ae1c427905200b/Mobile-device-security-considerations-for-small-and-medium-sized-enterprise-business-mobility.pdf.
EX2010	M. Cunche, M.A. Kaafar, and R. Boreli, “I Know Who You Will Meet this Evening! Linking Wireless Devices using Wi-Fi Probe Requests,” IEEE International Symposium on a World of Wireless, Mobile and Multimedia Networks (WoWMoM) (2012).
EX2011	J. Lindqvist et al., “Privacy-Preserving 802.11 Access-Point Discovery,” Microsoft Research Technical Report, MSR-TR-2009-7 at (2009), https://aaltodoc.aalto.fi/server/api/core/bitstreams/-7c421d1b-9ecd-45ee-8481-52f24ca272e5/content.
EX2012	M. Cunche, “I Know Your MAC Address: Targeted Tracking of Individual Using Wi-Fi,” 10 J. COMPUT. VIROL. HACK TECH. 219–227 (2014), https://doi.org/10.1007/s11416-013-0196-1.

Exhibit No.	Description
EX2013	W.S. Bhaya and S.A. AlAsady, "Prevention of Spoofing Attacks in the Infrastructure Wireless Networks," J. COMPUTER SCIENCE, 8(10) 1769-1779 (2012), https://web.archive.org/web/20150621205916id - /http://novintarjome.com/wp-content/uploads/2014/10/Prevention-of-Spoofing-Attacks.pdf .
EX2014	Declaration of Nikolaos Papanikolopoulos, Ph.D., in support of this First Motion to Amend
EX2015	U.S. Patent Application No. 16/215,406 (from which U.S. Patent No. 10,713,959 issued) (annotated to include line nos.) (the "'406 App.")
EX2016	U.S. Provisional Patent Application No. 62/175,153 (annotated to include page and paragraph nos.) (the "'153 Prov.")
EX2017	Curriculum Vitae of Dr. Nikolaos Papanikolopoulos

I. INTRODUCTION

Patent Owner Airspace Defense, Inc. respectfully moves under 35 U.S.C. § 316(d) and 37 C.F.R. § 42.121(f) to amend U.S. Patent No. 10,713,959 (the '959 patent). This revised motion, proposing substitute claim 22, is non-contingent with respect to the challenged claim 21. As discussed below, this revised motion complies with all of the requirements of 37 C.F.R. §§ 42.121(a) and (f), *Lectrosonics, Inc. v. Zaxcom, Inc.*, IPR2018-01129, Paper 15 (PTAB Feb. 25, 2019) identified in the Scheduling Order, and with the Trial Practice Guide (TPG).

II. LEVEL OF ORDINARY SKILL IN THE ART

Patent Owner does not dispute Petitioner's formulation regarding the level of ordinary skill in the art that was adopted by the Board.

III. SUBSTITUTE CLAIMS COMPLY WITH 37 C.F.R. § 42.121, *LECTROSONICS*, PAPER 15, AND THE TPG

A reasonable number of substitute claims: Per 37 C.F.R. § 121(a)(3), for each the sole challenged claim 21, Patent Owner proposes only a single corresponding substitute claim.

Responsive to a Ground of Unpatentability and Petitioners' Opposition: Proposed independent substitute claim 22 is amended to recite limitations that none of Petitioners' Grounds, including those in the Opposition, teaches or suggests. In particular, a "secure identifier" that proposed substitute claim 22 recites is limited as "comprising a specified excitation enabling disambiguation of" an authentic

“low-altitude aircraft from other detected low-altitude aircraft.” None of the new Grounds in the Opposition (or any in the Petition) teaches or suggests such a “secure identifier.” *See infra* § IV. As such, the proposed substitute claim 22 responds to one or more new Grounds of unpatentability per 37 C.F.R. § 42.121(f)(2).

No enlargement the scope of the challenged claims: Because the proposed substitute claim 22 retains all of the limitations of the corresponding challenged claim 21, except for a typographical correction, and because proposed independent substitute claim 22 adds further limitations, per 37 C.F.R. § 121(a)(2)(ii), no proposed substitute claim enlarges the scope of the sole challenged claim.

No new matter; supported in the original disclosure: Per 37 C.F.R. § 121(a)(2)(ii) and (b), proposed substitute claim 22 does not introduces new subject matter and is fully supported by the original disclosure of the '959 patent, as shown in the claim chart below. To show support in the “original disclosure of the application, as filed,” Patent Owner cites the relevant portions of the '406 App. and the '153 Prov.¹ *Lectrosonics*, Paper 11 at 7-8; 37 C.F.R. § 42.121(b)(1)-(2). The original disclosure includes the disclosure of the '153 Prov. because the '406 App. incorporates by reference the '153 Prov. EX2015 at 1:3-8; EX1001, 1:7-22.

¹ The relevant portions of the '406 App. are quoted; the corresponding portions of the '153 Prov. and the '959 patent are cited.

Claim Element	Support in the Specification
[22.pre] A device configured to communicate identification information associated with a <u>first</u> low-altitude aircraft, the device comprising:	EX2015 at 2:11-17 (“a low altitude aircraft identification system composed by three components: a small aircraft electronic identification box with an embedded logger, a ground identification equipment to automatically identify the aircraft just pointing at it, and a central identification code database server. The identification code can be transmitted by a visible light color sequence or by a radio frequency signal”), at 2:27-29 (“[i]nstead of the related art approach of stamping letters and numbers in the aircraft, the present example implementation is directed to a light array that blinks a defined color pattern sequence for each aircraft”), at 7:3-5 (“[t]he identification box 1 also has a radio antenna 5 connected to a RF module 16 shown in FIG. 2 as being connected to RF antenna 12, that transmits the same code or a modified version of the code through a radio signal”); FIG. 1; EX2016 ¶¶ 3, 6, 8 (Abstract), 29, at 9 (FIG. 1); EX1001, 2:7-15, 2:30-33, 5:15-18, FIG. 1. Thus, the ’406 App. and the ’153 Prov. both teach an “identification code,” that can identify a low-altitude aircraft, as the identification information. The “same code,” i.e., identification information, can be communicated using light and/or RF frequency.
[22.a] a radio frequency communication antenna; and	EX2015 at 7:3-5 (“[t]he identification box 1 also has a radio antenna 5 connected to a RF module 16 shown in FIG. 2 as being connected to RF antenna 12, that transmits the same code or a modified version of the code through a radio signal”), FIGS. 1, 2; EX2016 ¶ 29, at 9-10 (FIGS. 1, 2); EX1001, 5:15-18, FIGS. 1, 2. The ’406 App. and the ’153 Prov. each discloses that the identification box includes an RF (radio frequency) module that is coupled to an RF antenna that is shown as antenna 5 in FIG. 1 and as antenna 12 in FIG. 2.
[22.b] a radio communication module coupled to the radio frequency communication	EX2015 at 7:3-8 (“[t]he identification box 1 also has a radio antenna 5 connected to a RF module 16 shown in FIG. 2 as being connected to RF antenna 12, that transmits the same code or a modified version of the code through a radio signal. The RF module 16 can receive the RF signal from

Claim Element	Support in the Specification
antenna and configured to transmit identification information associated with the <u>first</u> low-altitude aircraft through a transmitted radio signal,	identification boxes (e.g. nearby) installed in other aircrafts”), FIGS. 1 and 2; EX2016 ¶ 29, at 9-10 (FIGS. 1, 2); EX1001, 5:15-23, FIGS. 1, 2. The ’406 App. and the ’153 Prov. each discloses that the RF module can transmit and receive signals, and is thus a communication module, that is coupled to the RF antenna 12. The RF module transmits the code, i.e., the identification information associated with the low-altitude aircraft, through the RF antenna that transmits a radio signal.
[22.c] wherein the radio communication module is configured to receive a [[received]] radio signal and store the <u>received</u> information in a storage,	EX2015 at 7:5-8 (“[t]he RF module 16 can receive the RF signal from identification boxes (e.g. nearby) installed in other aircrafts, and save this information in the non-volatile storage module 15 that is connected to the memory card installed in the memory card slot 7”), 9:18-21 (“[t]he RF receiver and transmitter 16 and 37 in both the identification box 1 and the ground device 21 creates a duplex communication. Therefore, the identification box 1 and ground device 21 together can exchange information through light or RF. This feature allows other applications. One example application may be to send data to an UAV through light and RF”); EX2016 ¶ 36; EX1001, 5:18-23, 6:63-7:2. Thus, the ’406 App. and the ’153 Prov. each teaches that the RF module of the identification box can receive information from the respective identification boxes of the nearby aircraft, and can also receive data from a ground device. The information received via RF signals is stored in a storage module / memory.
[22.d] wherein the radio frequency communication antenna is coupled to the <u>first</u> low-altitude aircraft and	EX2015 at 12:13-14 (“FIG 7 shows the identification box software flow, according to the example implementation”), at 13:1-6 (“[a]s shown in flow 72 ... at 721, light sensor detects a light beam. For example, the light beam may be received from the ground device. At 722, the central control module receives the light beam information, and verifies the wavelength of the light beam. Based on the wavelength of light beam, it is determined whether the received light beam

Claim Element	Support in the Specification
	is a light beam associated with an instruction for that aircraft associated with the identification box that is attached to the aircraft”), FIG. 7; EX2016 ¶ 3 (“an identification box attached to the aircraft[]”), at 15 (FIG. 7); EX1001, 8:60-61, 9:18-26, FIG. 7. <i>See supra</i> element [22.b] (disclosing that the identification box includes the RF module 16, which is coupled to the RF antenna 12). Thus, both the ’406 App. and the ’153 Prov. disclose that the identification box is attached to the low-altitude aircraft. Because the RF antenna is coupled to the RF module, which is included in the identification box that is attached to the low-altitude aircraft, the RF antenna is coupled to the low-altitude aircraft.
[22.e] the radio communication module is configured to utilize a secure identifier, <u>the secure identifier comprising a specified excitation enabling disambiguation of the first low-altitude aircraft from other detected low-altitude aircraft,</u> [[and]]	EX2015 at 3:22-26 (“The identification box has a photo sensor configured to receive external signals. In case the photo sensor is excited with a high luminous beam in a specific wavelength and modulation, such as a laser beam, the identification box may change its operational behavior. The identification box can, for instance, change its light brightness, send commands to the autopilot, increase the data storage frequency, but is not limited thereto.”), EX2016, ¶ 9; EX1001, 3:1-8. EX2015 at 3:31-4:4 (“it is just a matter of directing a specific wavelength and modulated light beam emitter to one of the aircrafts, and the aircraft will thus modify its behavior and its transmitted data, allowing the data-to-vehicle association. This feature creates a duplex communication, allowing the identification box to send broadcast data by its color light emitters, and receive directional data through the light sensor”); EX2016, ¶ 9; EX1001, 3:14-21. EX2015 at 9:6-12 (“In order to activate (e.g., excite) the identification box light sensor 19, the ground device has a light beam emitter 23 connected to a light beam modulator 35, shown as emitter 31 in FIG. 4. The light beam excitation

Claim Element	Support in the Specification
	flow 82 is executed by the ground device 21. This beam, when captured by the light sensor 19 will change the data transmitted by the identification box RF module 16. This difference in the data is detected by the ground device RF module 37, and the light excited aircraft id presented in the field 55 will be shown in a distinguishable form, for example but not by way of limitation, bold-text”), FIG. 4; EX2016, ¶ 34, FIG. 4; EX1001, 6:43-53, FIG. 4. EX2015, 9:15-21 (“The identification box light emitters 3 and light sensor 4 of the identification box 1 create a two-way communication system. Similarly, the ground device camera 22 and light beam emitter 23 of the ground device 21 also create a two-way communication system. The RF receiver and transmitter 16 and 37 in both the identification box 1 and the ground device 21 creates a duplex communication. Therefore, the identification box 1 and ground device 21 together can exchange information through light or RF. This feature allows other applications. One example application may be to send data to an UAV through light and RF.”) Thus, the ’406 App. and the ’153 Prov. both teach that: (i) the ground station can send a specific excitation to the low-altitude aircraft using light or RF; (ii) The radio communication module 16 of the low-altitude aircraft receives the specific excitation; (iii) in response the low-altitude aircraft changes its behavior; and (iv) the ground station can detect the change. Only an authentic aircraft would recognize the specific excitation and respond by changing its behavior. A rogue aircraft would not respond in this way. As such, the detection of the changed behavior facilitated by the specific excitation enhances security by enabling identification and disambiguation of the authentic low-altitude aircraft from others. Upon detecting the changed behavior, the ground system disambiguates (presents in a distinguished form) the low-altitude aircraft that did respond by changing its behavior from other detected aircraft that do not change their behaviors.

Claim Element	Support in the Specification
[22.f] <u>wherein utilizing the secure identifier comprises receiving by the radio communication module the specified excitation from a remote portable detection system, wherein the specified excitation causes the first low-altitude aircraft to change a behavior thereof,</u>	<i>See supra</i> element [22.e]
[22.g] the radio communication module is configured for two-way communication with [[a]]the remote portable detection system; and	EX2015 at 8:1-3 (“[t]he other component of the example implementation is the ground identification device 21, which is remote from the UAV or UAS, as shown in left and right perspective in FIG[S]. 3A and 3B respectively, and with its internal schematic in FIG. 4”), at 8:6-9 (“the ground identification device 21 may be a mobile communication device (e.g., smartphone)”), ”); FIGS. 3A-5; EX2016 ¶¶ 32, ¶¶ 4 (“a ground identification device to identify the aircraft by just pointing at it”), 12 (“if the ground user wants to check if one specific vehicle has permission to fly in that area, he just points the identification device to the aircraft”), 36 (“[t]he user goes outside, points the ground device 21 to the UAV”), 37 (“the ground device 21 is attached to an aircraft”), at 11-13 (FIGS. 3A-5); EX1001, 5:55-59, 5:63-67, FIGS. 3A-5. EX2015 at 8:28-30 (“[t]he ground identification device 21 also can detect aircrafts through the RF signal transmitted from the identification box RF module 16. The signal is received by the RF receiver antenna 26 connected to the RF receiver module 37, shown as antenna 33 in FIG. 4”), at 9:18-21 (“[t]he RF receiver and transmitter 16 and 37 in both the identification box 1 and the ground device 21

Claim Element	Support in the Specification
	creates a duplex communication. Therefore, the identification box 1 and ground device 21 together can exchange information through light or RF"); EX2016 ¶¶ 33, 36; EX1001, 6:31-35, 6:63-67. <i>See supra</i> element [22.b] (disclosing that the RF module 16, i.e., the radio communication module, includes the RF antenna 12). Thus, the '406 App. and the '153 Prov. discloses a ground identification device that is remote and that can be a mobile device such as a smartphone and/or a device that can be pointed at a low-altitude aircraft by a user and that can be attached to such an aircraft. As such, the ground detection device is a remote portable detection system. Moreover, RF receiver and transmitter, i.e., RF antennas 16 (in the RF module of the identification box) and 37 (in the ground identification device) create duplex, i.e., two-way communication between the RF module 16 (the radio communication module) and the ground identification device (the remote portable detection system).
[22.h] wherein the device is coupled to the <u>first</u> low-altitude aircraft and	EX2015 at 13:1-6 (“[a]s shown in flow 72 ... at 721, light sensor detects a light beam. For example, the light beam may be received from the ground device. At 722, the central control module receives the light beam information, and verifies the wavelength of the light beam. Based on the wavelength of light beam, it is determined whether the received light beam is a light beam associated with an instruction for that aircraft associated with the identification box that is attached to the aircraft”); EX2016 ¶ 3 (“an identification box attached to the aircraft[]”); EX1001, 9:18-26. The '406 App. and the '153 Prov. describe that the identification box, i.e., the device, is attached to the low-altitude aircraft.
[22.i] the remote portable detection system includes a	EX2015 at 8:1-3 (“[t]he other component of the example implementation is the ground identification device 21, which is remote from the UAV or UAS, as shown in left and

Claim Element	Support in the Specification
user interface configured to provide to a user, information associated with a plurality of different low-altitude aircrafts detected by the remote portable detection system[[]], <u>the plurality comprising the first low-altitude aircraft and the remote portable detection system is configured to disambiguate the first low-altitude aircraft from the other detected low-altitude aircraft of the plurality based on the changed behavior of the first low-altitude aircraft.</u>	right perspective in FIG[S]. 3A and 3B respectively, and with its internal schematic in FIG. 4. In addition, the main user interface is shown in FIG. 5”), at 8:16-18 (“[i]n case of a successful detection, the detected code is informed to the touchscreen 24, in the field 51 as shown in FIG. 5. A detection window 54 will be shown around the detected aircraft”), FIG. 5; EX2016 ¶¶ 17, 23, 32, at 13 (FIG. 5); EX1001, 5:55-60, 6:13-16, FIG. 5 EX2015 at 8:28-9:5 (“[t]he ground identification device 21 also can detect aircrafts through the RF signal transmitted from the identification box RF module 16. The signal is received by the RF receiver antenna 26 connected to the RF receiver module 37, shown as antenna 33 in FIG. 4. Since many signals can be received at the substantially same time by the receiver module 37, the detected ids are presented in the field 55 in a list format. If at any time the user decides to use the touchscreen 24 to select (e.g., click) on any id number, a request will be made to a server following the aircraft information flow 61 of FIG. 6, to show more information about that aircraft”), FIGS. 4-6; EX2016 ¶ 33, at 12-14 (FIGS. 4-6); EX1001, 6:31-42, FIGS. 4-6. EX2015 at 9:6-12 (“In order to activate (e.g., excite) the identification box light sensor 19, the ground device has a light beam emitter 23 connected to a light beam modulator 35, shown as emitter 31 in FIG. 4. The light beam excitation flow 82 is executed by the ground device 21. This beam, when captured by the light sensor 19 will change the data transmitted by the identification box RF module 16. This difference in the data is detected by the ground device RF module 37, and the light excited aircraft id presented in the field 55 will be shown in a distinguishable form, for example but not by way of limitation, bold-text”), FIG. 4; EX2016, ¶ 34, FIG. 4; EX1001, 6:43-53, FIG. 4. Thus, the ’406 App. and the ’153 Prov. each discloses that the ground detection device has a user interface, and that the ground detection device can detect several low-altitude aircraft at the same time, and display their respective IDs in

Claim Element	Support in the Specification
	the user interface, thus provide information associated with the several detected low-altitude aircraft to the user. Each of the '406 App. and the '153 Prov. also discloses that only an authentic aircraft would recognize the specific excitation and respond by changing its behavior. An rogue aircraft would not respond in this way. As such, the detection of the changed behavior facilitated by the specific excitation enhances security by enabling identification and disambiguation of the authentic low-altitude aircraft from others. Upon detecting the changed behavior, the ground system disambiguates (presents in a distinguished form) the low-altitude aircraft that did respond by changing its behavior from other detected aircraft that do not change their behaviors.

IV. SUBSTITUTE CLAIM 22 IS PATENTABLE

Patent Owner respectfully submits that the proposed substitute claim 22 is patentable over the prior art cited in the Grounds asserted in this IPR proceeding, including those in the Opposition (the “IPR Prior Art”). In particular, proposed independent substitute claim 22 recites: “the secure identifier comprising a specified excitation enabling disambiguation of the first low-altitude aircraft from other detected low-altitude aircraft.” Proposed substitute claim 22 further recites: “utilizing the secure identifier comprises receiving by the radio communication module the specified excitation from a remote portable detection system, wherein the specified excitation causes the first low-altitude aircraft to change a behavior thereof.”

In addition, the proposed substitute claim 22 recites: “the remote portable detection system is configured to disambiguate the first low-altitude aircraft from the other detected low-altitude aircraft of the plurality [of different low-altitude aircrafts detected by the remote portable detection system] based on the changed behavior of the first low-altitude aircraft”

Among the IPR Prior Art upon which Petitioners rely in the Opposition, Patent Owner respectfully submits that Beard-Provisional and Byers are not prior art. In the Institution Decision, the Board determined, based on an interpretation of the claim term “secure identifier,” that the ’959 patent is not entitled to claim priority to the ’153 provisional. Paper 13 at 12. Patent Owner acknowledges the Board’s preliminary construction of “secure identifier,” *id.* at 10.

In proposed substitute claim 22, “secure identifier” is defined as “comprising a specified excitation enabling disambiguation of the first low-altitude aircraft from other detected low-altitude aircraft.” A secure identifier thus limited is fully supported by both the ’406 App. and the ’153 provisional. *See supra* § IV. All other limitations of proposed substitute claim 22 are also fully disclosed by both the ’406 App. and the ’153 provisional. *See id.* Therefore, Patent Owner respectfully submits that proposed substitute claim 22 is entitled to claim priority to the ’153 provisional, and as such, Beard-Provisional and Byers are not prior art.

According to the proposed substitute claim 22, the ground station may send

a specific excitation to the low-altitude aircraft using RF, and the radio communication module 16 of the low-altitude aircraft receives the specific excitation. In response, the low-altitude aircraft changes its behavior, and the ground station detects the change. Only an authentic aircraft would recognize the specific excitation and respond by changing its behavior. An rogue aircraft would not respond in this way.

As such, the detection of the changed behavior facilitated by the **specific excitation enhances security by** enabling identification of the authentic low-altitude aircraft. Upon such identification, the ground station can disambiguate, e.g., by changing the form of display, the identified authentic low-altitude aircraft from others that did not change their behaviors.

None of the combinations of the IPR Prior art, including those in the Opposition, teaches or suggests a secure identifier defined and utilized according to proposed substitute claim 22. The proposed substitute claim 22 is therefore patentable.

V. CONCLUSION

In light of the foregoing, Patent Owner respectfully requests that the Board grant this revised motion to amend.

Respectfully submitted,

Dated: April 20, 2026

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CLAIMS APPENDIX

Proposed substitute claims are shown in the marked-up form below:

- [22.pre] A device configured to communicate identification information associated with a first low-altitude aircraft, the device comprising:
- [22.a] a radio frequency communication antenna; and
- [22.b] a radio communication module coupled to the radio frequency communication antenna and configured to transmit identification information associated with the first low-altitude aircraft through a transmitted radio signal,
- [22.c] wherein the radio communication module is configured to receive a ~~[[received]]~~ radio signal and store the received information in a storage,
- [22.d] wherein the radio frequency communication antenna is coupled to the first low-altitude aircraft and
- [22.e] the radio communication module is configured to utilize a secure identifier, the secure identifier comprising a specified excitation enabling disambiguation of the first low-altitude aircraft from other detected low-altitude aircraft, ~~[[and]]~~
- [22.f] wherein utilizing the secure identifier comprises receiving by the radio communication module the specified excitation from a remote portable detection system, wherein the specified excitation causes the first low-altitude aircraft to change a behavior thereof,
- [22.g] the radio communication module is configured for two-way communication with ~~[[a]]~~the remote portable detection system; and
- [22.h] wherein the device is coupled to the first low-altitude aircraft and

[22.i] the remote portable detection system includes a user interface configured to provide to a user, information associated with a plurality of different low-altitude aircrafts detected by the remote portable detection system[[]], the plurality comprising the first low-altitude aircraft and the remote portable detection system is configured to disambiguate the first low-altitude aircraft from the other detected low-altitude aircraft of the plurality based on the changed behavior of the first low-altitude aircraft.

Certificate of Service

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing Patent Owner's Revised Motion to Amend (not accompanied by any new exhibits) was served via email on April 20, 2026 (per counsel's consent) to lead and backup counsel of record for Petitioners as follows:

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