

Application for Experimental Special Temporary Authority Call Sign WL9XAF

NARRATIVE STATEMENT

Astranis Space Technologies Corp. ("Astranis") hereby requests 180-day experimental special temporary authorization ("STA") to conduct previously authorized¹ tests and demonstrations, commencing on December 15, 2017. Although Astranis currently holds Commission authority to conduct the identical operations sought herein, due to an unforeseen launch delay, this STA is required to update the commencement date and ensure that Astranis is afforded the full 180-day test period to analyze and demonstrate this innovative satellite technology.

Although the Demosat-2 satellite was scheduled to be launched on approximately October 1, 2017, a launch slip has caused the expected launch date to be pushed out to December 15, 2017.² As the Commission is aware, the experimental tests and demonstrations planned by Astranis will be conducted intermittently over a six-month period commencing shortly after launch of the Astranis Demosat-2 satellite.³ Thus, Astranis seeks this STA out of necessity because it is

¹ See Astranis Space Technologies Corp., File No. 0113-EX-ST-2017, Call Sign WL9XAF (authorization effective from October 1, 2017 to April 2, 2018) ("Astranis Experimental License").

² The Astranis Demosat-2 satellite was scheduled to be launched as a secondary payload aboard a Polar Satellite Launch Vehicle (PSLV) in October 2017, however, an unexpected launch malfunction has caused significant delays in the PSLV launch schedule. *See* Loren Grush, *India's workhouse rocket fails for the first time in decades* (31 Aug 2017), <u>https://www.theverge.com/2017/8/31/16234434/india-isro-pslv-rocket-failure-payload-fairing-irnss-1h</u>.

³ Astranis hereby incorporates by reference the information previously submitted in support of the *Astranis Experimental License* application, including the satellite and earth station parameters, spectrum compatibility study and description of the experimental testing. *See Astranis Experimental License*, Updated Narrative and Attachments (filed on Aug. 8, 2017).



imperative that it has the full six months to test and demonstrate components, software design, and operational concepts that are integral to the planned satellite product line.

This request is filed in accordance with guidance from the Commission staff, as well as time frames established by the Commission for consideration of experimental satellite applications.⁴ Moreover, grant of the requested experimental STA is fully consistent with Commission's guidance, policy and experimental licensing rules.⁵ Astranis will fully comply with its existing authorization and will continue to adhere to the special conditions implemented by the Commission in the *Astranis Experimental License*.

Grant of the requested authority will serve the public interest by allowing Astranis to more effectively test and demonstrate the mission, thereby facilitating the growth and development of this next-generation satellite technology. Accordingly, Astranis respectfully requests that the Commission grant this application for a 180-day STA to permit the previously authorized operations with an updated commencement date of December 15, 2017.

⁴ See Guidance on Obtaining Licenses for Small Satellites, Public Notice, DA 13-445 (March 15, 2013).

⁵ See 47 C.F.R. Part 5; see also 47 C.F.R. §5.61 (procedure for obtaining a special temporary authorization).