

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Application of BlackSky Global, LLC)	FCC File No. 0829-EX-PL-2014
For Experimental Satellite Authority)	Call Sign WH2XPT

PETITION FOR RECONSIDERATION

BlackSky Global, LLC (“BlackSky”), by its counsel, hereby seeks reconsideration of the action on its above-referenced application (the “Application”) for experimental satellite authority, which the Office of Engineering and Technology (“OET”) denied in part on October 22, 2015.

On December 10, 2014, BlackSky submitted the Application and a corresponding application for experimental earth station authority¹ to launch and operate a satellite network for demonstration and testing purposes. OET granted the experimental earth station application, which sought authority to communicate with the satellites from five locations, on February 26, 2015.

With its subject space station Application, BlackSky sought authority to test and demonstrate the use of two satellites – named Pathfinder-1 and Pathfinder-2 – for a period of eighteen (18) months. BlackSky’s experimental space station application sought the use of an X-band frequency centered at 8080 MHz for its primary earth exploration data transmission and UHF frequencies in the 401-402 MHz band for secondary TT&C operations.

¹ FCC File No. 0831-EX-PL-2014; Call Sign WH2XPS.

The Application was granted in part on October 22, 2015. OET, however, denied the use of the X-band frequency² that is critical to BlackSky's operations. The license grant states that BlackSky's proposed use of the frequency 8080 MHz is not permitted "because it is a potential harmful interference to Federal operations." No further indication as the nature of that interference is indicated.³

Because no substantive explanation has yet been provided, BlackSky herein respectfully requests reconsideration of the portion of its Application that was denied and asks OET to (a) advise BlackSky as to what aspects of its proposed operation creates the interference concern; and (b) return its Application to a pending status so that, once the interference problem is identified, it may amend the Application to address the issues of concerns, or accept and process a modification application of its space station authority to permit it to add an X-band frequency having addressed those concerns.

² See BlackSky Global, LLC Radio Station License and Construction Permit, Call Sign WH2XPT, Special Condition 4.

³ BlackSky notes that operational authority for the proposed satellites was initially granted by Special Temporary Authority under Call Sign WH9XCA (FCC File No. 1004-EX-ST-2013). Because of launch delays, however, that Authority expired before it could be implemented. When resubmitted, some minor adjustments in the technical parameters were requested, but BlackSky does not know whether those changes are the source of the current interference issue.

BlackSky is making significant investment toward the development of an earth exploration technology and maintains that the public interest is served by the grant of its reconsideration request as the demonstration and testing of its system will permit it to assemble critical data regarding its proposed imaging and communications system.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jonathan L. Wiener". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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