

From: William Smith

To: Behnam Ghaffari

Date: January 13, 2021

Subject: FCC File No.0910-EX-ST-2020

Message:

Per your 6/30 email for our application 0910-EX-ST-2020, the FCC required an Iridium companion license. In a previous response to our application in late July 2020, I notified the FCC, through the OET website, that Iridium's position is that their "blanket mobile earth station license" should cover our project since transmission would not occur until descent below 20-30 km. Per your recent 1-4-21 correspondence, you again asked that Iridium file an STA to support our project. I, again, contacted Joseph Godles with Iridium asking about filing the companion license request. His 1-10-21 response to me reiterated their position from July 2020: "What I meant to convey in my emails was that neither you nor Iridium should have to file for experimental authority. Transmissions to and from a standard Iridium modem that will occur only at an altitude of 20-30 km should be covered by Iridium's Part 25 licenses."

I was tasked to oversee the communication licensing for our project to satisfy any requirements of our NASA project administrators as well as the FCC. I have twice contacted Iridium and have twice been advised that their position is that we should not need the STA. I am going to reach out to Mr. Godles once again to reiterate your companion license requirement to see if he is willing to proceed with the companion license.

My goal is to ensure that the communication needs of our project comply with FCC requirements. This is my first application and I have no experience on the best way to resolve this, other than contacting Iridium with a third request. I would appreciate any thoughts you have regarding my approach or, given reinforcement of their earlier position, whether there could be merit to Iridium's blanket coverage statement. Thank you again for your time and help with our application.

Regards – Bill Smith