

NARRATIVE STATEMENT

Aprize Satellite, Inc. (“Aprize”) respectfully submits this renewal application associated with existing experimental authority to operate the AprizeSat-8 and AprizeSat-10 satellites.¹ Aprize’s existing authority is set to expire on July 1, 2021, and this renewal applications is filed out of an abundance of caution during the pendency of concurrently filed applications for space station operating authority and special temporary authority (“STA”) for the AprizeSat-8 and AprizeSat-10 satellites under the Federal Communication Commission’s Part 25 streamlined small satellite (“smallsat”) rules.² Aprize has been validating and performing smallsat-based ship tracking operations in novel frequency bands, including for the Naval Research Lab, Homeland Security, and the U.S. Coast Guard, under the existing authorization.

The operating parameters of the AprizeSat-8 and AprizeSat-10 satellites included in this renewal application are identical to those in the existing authorization.³ Specifically, Aprize will continue to conduct downlink operations for TT&C in the 400.5-400.65 MHz band and data downlink in the 2300-2305 MHz band. The AprizeSat-8 and AprizeSat-10 satellites have operated intermittently (*i.e.*, as needed) in these bands for years on an unprotected, non-interference basis without any interference issues or otherwise adversely affecting other systems or services.

¹ See Aprize Satellite Inc., File No. 0301-EX-CR-2019, Call Sign WD2XFT (granted June 20, 2019).

² See 47 C.F.R. § 25.122.

³ Aprize clarifies that only the AprizeSat-8 and AprizeSat-10 satellites are currently operational; the AprizeSat-2 and AprizeSat-5 satellites are no longer operational.

Continuing authority under Aprize's existing license (Call Sign WD2XFT) will serve the public interest by allowing in-orbit satellites to continue to operate during the pendency of related smallsat license and STA applications. Aprize will inform the Experimental Licensing Branch of developments associated with these applications and will surrender the Aprize license (Call Sign WD2XFT) upon grant of other appropriate space station operating authority.