



February 08, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street South West
Washington, D.C. 20554

**RE: BlackSky Global LLC – Call Sign S3032
Letter in Support of ATLAS Space Operation, Inc. File Number 0172-Ex-ST-2019**

Dear Ms. Dortch,

BlackSky Global LLC (“BlackSky”) submits this letter in support of ATLAS Space Operations, Inc (“ATLAS”) Special Temporary Authority (“STA”) Filing Number 0172-Ex-ST-2019 for the operation of its Guam earth station to communicate with BlackSky’s Global satellites. ATLAS filed its initial application for authority to operate the station on December 24, 2018 (See Application for Earth Station Authority, FCC call sign E190037, File No. SES-LIC-20181224-0365). That application remains pending and has not yet gone on Public Notice.

As background, BlackSky obtained a grant from the Commission for authority to construct, deploy and operate a constellation of up to four (4) technically identical Non-Geostationary Satellite space stations called Global 1-4, pursuant to its application IBFS File No. SAT-LOA-20180320-00023, Call Sign S3032, in accordance with the terms and conditions set forth in the authorization, which was originally granted by the FCC on October 3, 2018, and corrected on October 23, 2018.

It is important to BlackSky that the Guam earth station be permitted to come on line before the launches of Global-3 and Global-4, each currently scheduled for April 2019. While BlackSky has other earth stations to communicate with its satellites, due to the inclined orbits planned for Global-3 and Global-4, there would be a daily gap between passes at the earth stations that are capable of communicating with these satellites of 16-18 hours. If BlackSky is able to utilize the Guam earth station referenced herein, the gap between passes will be reduced to 5-9 hours. Use of the Guam earth station will significantly reduce the risks during early operations and enable more frequent and predictable contact with each spacecraft to address potential collision avoidance and perform orbit maintenance. For this reason, BlackSky views the operation of the Guam earth station as important to protect and maintain Global-3 and Global-4 in safe and stable orbits and urges that granting the STA serves the public interest.

While ordinarily there might still be time for the Guam earth station to be regularly licensed without need for an STA, given delays that have already occurred due to the previous government shutdown, the resulting backlog, and concern that there may occur yet another shutdown in the near future, BlackSky believes that it is prudent for ATLAS to seek such temporary authority and BlackSky supports that effort.

BlackSky is mindful of the condition to its space station authorization (Condition 7) that restricts its transmission of remote sensing data in the 8025-8400 MHz frequency band to those stations that



have been coordinated with the National Aeronautics and Space Administration (NASA). Currently, coordination with NASA has been completed for only the planned initial earth stations noted above. Efforts to coordinate transmissions to the Guam station have been delayed due to the federal government shutdown and the furlough of the team at NASA responsible for such coordination. While BlackSky continues to work to coordinate, even with an STA grant for the operation of the Guam station, BlackSky will not transmit to it in the 8025-8400 MHz frequency band until NASA is able to confirm coordination. Nevertheless, for the reasons stated above, BlackSky urges grant of the STA request in order to allow communication with its spacecraft on the other requested frequencies.

Please contact Kristina Hloptsidis (kristinah@spaceflightindustries.com) if you have any questions.

Best Regards,

Kristina Hloptsidis
Director of Regulatory and Compliance