

To: Victor Gomez
E-Mail: victor.gomez@ga.com
From: Anthony Serafini
Date: December 20, 2021

Subject: Request for Info - File # 1064-EX-CN-2020

Message:

The International Bureau is requesting additional information. Please upload an exhibit that responds to the following questions.

1. Noting that the currently specified mission altitude of 750km was described in GA's response of 6/2/2021 as chosen due to a specification in the mission contract, please indicate whether that contract was executed subject to any necessary regulatory approvals.
2. Please indicate whether, to your knowledge, the spacecraft or any of its component parts has been the subject of a customer-conducted safety or orbital debris mitigation review, and if so, please indicate who conducted the review, and the nature and scope of that review.
3. Please state whether the design for demise measures described in your response of 6/2/21 are inclusive of all subcomponents analyzed for re-entry casualty risk, noting in particular the items identified as the ARGOS TXU and RPU, which we assume correspond to the NOAA/CNES-supplied UHF/L-band radio. Please indicate which particular components were considered as ones with "high kinetic energy" and were "conservatively modelled" and identify with specificity the particular modelling methods involved. To the extent a higher fidelity method can support the assertion that some or all of these components may demise upon re-entry, please provide an analysis utilizing that method.
4. Please indicate whether the program of experimentation, which appears to be focused on correlation of measurements with communications link performance, would meet its technical objectives at a lower altitude.
5. Please provide an update on whether the drag sail model utilized on STPSAT-3, as noted in your 6/2/2021 response concerning flight heritage, has been deployed.
6. Noting that the application includes a statement that the "[r]equest for S-Band spectrum is consistent with federal Space Operations usage for the OTB-3 satellite telemetry, Hosted Payload telemetry, and RADMON experimental data download" and that the satellite has been described in some official documents as a "Federal" satellite, please address why the satellite should not be considered a station "belonging to and operated by..." the Federal government, and therefore not subject to FCC licensing.
7. Please indicate whether General Atomics will have the technical capability to terminate the supply of power to the NOAA/CNES-supplied UHF/L-band radio or in any other way to pause, terminate, or limit its operations.
8. Please indicate whether General Atomics has the unilateral capability, both technically and legally, to terminate all radiofrequency operations of the satellite. In your response, please indicate there are any contractual limitations on General Atomics' ability to exercise any such capability, including but not limited to requirements for prior consultation, specifications concerning required performance, definitions of nominal and off-nominal operations, etc. If so, please describe them in detail and indicate whether those provisions of the contract are subject to any necessary regulatory approvals.
9. The five-year license time frame is described in the application as "to allow the primary RADMON payload sufficient time to gather measurement data on the effects of long-term exposure to radiation on

the experiments.” Noting the use of the plural “experiments,” the only description of an experiment in the application is the RADMON sensor itself. Please provide further explanation of the scope of the experimental program. Please address whether the objectives of this activity could be addressed in conjunction with a license issued under Part 25 of the Commission’s rules. Please indicate whether, if the satellite continues to be capable of operation after five years, it is expected that a request to continue operations will be submitted.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of December 20, 2021 may result in application dismissal pursuant to Section 5.67 and forfeiture of the filing fee pursuant to Section 1.1108.

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Responses to this correspondence must contain the Reference number : 66480