



PIXXEL

19 March 2020

Subject: Response to Inquiry (Ref. No. 53707)

FCC experimental application file number: 0886-EX-CN-2019

Nimesh,

This is in reference to the request for Pixxel to apply under ITU RR 4.4 with respect to its SpaceCap filing associated with the experimental application. Pixxel believes that ITU RR 4.4 is not appropriate for the following reason:

- The frequencies 2243 MHz and 401.9 MHz correspond to the 2200-2290 MHz frequency band, which is allocated for Earth Exploration Satellite Services in all ITU regions, and the 401-402 MHz band, which is allocated for Space Operations in all ITU regions. The Pixxel satellite meets both both service allocation definitions. Accordingly, ITU RR 4.4 is not necessary.

The frequency 149 MHz is subject to coordination for the mobile-satellite service (47 C.F.R. § 2.106 - 5.219). Pixxel's application falls under the Earth-exploration satellite service. Please feel free to contact the below if you have any questions.

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Sincerely,

Signature
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