

Response to Question 5 of Antenna Registration Form (Height of Antenna):

Space Data's network utilizes an innovative balloon-borne system, a type of stratospheric high altitude platform ("HAP"), which differs from traditional terrestrial, tower-based networks.¹ Space Data's system utilizes inexpensive weather balloons to carry miniature radio repeaters to altitudes of between 65,000 and 90,000 feet. These balloon-based platforms are known as SkySite[®] platforms.

Space Data continuously launches platforms to fill the constellation so that as one platform drifts out of range another platform drifts into range. The weather patterns at the altitude to which SkySite[®] platforms are deployed are generally uniform, allowing Space Data to predict a platform's movement and when to deploy additional platforms, ensuring consistent coverage. An on-board Global Positioning System ("GPS") receiver provides tight control of transmit frequency, protocol timing, and transmit power near service area borders. Thus, Space Data's HAP network is highly reliable. The lightweight (less than six pounds) platforms parachute gently back to earth 12 to 24 hours after deployment and are recovered and reused.²

The SkySite[®] platforms are so small that the FAA has concluded that Space Data's system is safe and has approved its use in the United States.³ Exhibit 3 includes a January 29, 2003 letter from the FAA to Space Data indicates the FAA's findings with regard to Space Data's SkySite[®] platforms. To the extent necessary, Space Data will acquire any required Federal Aviation Administration ("FAA") flight clearances and will provide the needed flight controllers, technicians, and all logistics for the flights.

¹ The Commission has authorized Space Data to operate its balloon-borne devices as terrestrial base stations. See *Petition for a Declaratory Ruling, a Clarification or, in the Alternative, a Waiver of Certain Narrowband Personal Communications Services (PCS) Rules as they Apply to a High-Altitude Balloon-Based Communications System*, 16 FCC Rcd 16421 (WTB 2001) ("Space Data Order").

² Additional information regarding the technical operations of Space Data's network of SkySite[®] platforms is set forth in the construction notification for one of Space Data's narrowband PCS licenses, KNKV204. See ULS File No. 0001900882 (filed October 13, 2004).

³ See *Space Data Order*, 16 FCC Rcd at 16427 (noting that Space Data has coordinated with the FAA regarding its balloon launches).