Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
HawkEye 360, Inc.	)	File No. SAT-AMD-_____
	)	
Amendment Application for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in the Earth-Exploration Satellite Service	)	Call Sign: S3042

APPLICATION

HawkEye 360, Inc. ("HE360") hereby amends its partially granted space station license and pending application[1] and requests authority to add additional antennas to its satellites and increase the range of sensed radio frequency ("RF") spectrum to include the following:

- the Global Positioning System ("GPS") L1 (at 1575.42 MHz), L2 (at 1227.60 MHz), and L5 (at 1176.45 MHz) signals (from terrestrial sources); and
- the 600 MHz to 10 GHz band.[2]

Except as stated specifically in this Application, HE360 is not requesting other changes to its authorized satellite operations and certifies that such operations remain unchanged.[3]

On December 10, 2019, the International Bureau authorized HE360,[4] *inter alia*, to passively sense the following frequency ranges: 100-182 MHz, 382-422 MHz, 1.6-1.7 GHz, 2.9-

[1] *See* Stamp Grant, HE360, IBFS File No. SAT-LOA-20190102-00001 (granted in part Dec. 10, 2019) ("License"); *see also* Application of HE360, IBFS File No. SAT-LOA-20170508-00071 (filed Jan. 2, 2019) ("Initial Application").

[2] Beginning with cluster 4, HE360 plans to add a spiral-backed antenna (enabling sensing from 600 MHz to 10 GHz) and remove the molded button antenna (currently sensing from 1.4 GHz to 7.0 GHz) on future clusters. Accordingly, the change effectively adds the 600 MHz to 1400 MHz range.

[3] HE360 also submits updated ownership information. *See* Attachment 2, Ownership Exhibit.

3.1 GHz, 1.4-7.0 GHz, and 6.0-18.0 GHz (the "Sensed Frequencies").[5] HE360 now seeks to expand the range of the Sensed Frequencies. HE360 will add a GNSS antenna to allow for sensing of the GPS L1, L2, and L5 signals.[6] Additionally, beginning with satellite cluster 4, HE360 plans to add a spiral-backed antenna (enabling sensing from 600 MHz to 10 GHz) and remove the molded button antenna (currently sensing from 1.4 GHz to 7.0 GHz) on future clusters. The additional or replacement antennas do not result in any material change to HE360's orbital debris assessment report.[7]

Grant of the Application serves the public interest. The authorization will expand HE360's RF sensing capabilities and enhance the range of services provided to customers. Additionally, passively sensing frequencies cannot cause harmful interference to other users.[8]

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[4] *See* License. Although not relevant to this Application, the License was granted in part for up to 80 satellites, subject to further coordination with Federal operators with respect to the transmit/receive frequencies. *See* Letter from Michael Mineiro, VP Legal, Regulatory, and Government Affairs, HE360, to Stephen Duall, Chief, Policy Branch, Satellite Division, FCC, IBFS File No. SAT-LOA-20190102-00001 (filed Dec. 4, 2019).

[5] *See generally* Initial Application. Although not relevant to this Application, the FCC also authorized the reception of certain publically available signals of interest, *e.g.*, AIS and ADS-B.

[6] Passive sensing of the terrestrially transmitted GPS signals will only include the collection of time difference of arrival and frequency difference of arrival data for geolocation purposes. HE360 will not collect or use the positioning, navigation, and timing data contained in the signals.

[7] The addition or replacement of an antenna is not an input parameter in the National Aeronautics and Space Administration Debris Assessment Software.

[8] The FCC has consistently concluded that using receive-only signals cannot cause harmful interference because the signals will be present regardless of the reception by the satellite license applicant. *See, e.g.*, *Iridium Constellation LLC*, Order and Authorization, 31 FCC Rcd 8675 ¶ 21 (2016); Stamp Grant, Spire Global, Inc., IBFS File No. SAT-AMD-20161114-00107 (granted in part Apr. 7, 2017) (authorizing satellite reception of AIS 1, AIS 2, AIS 3, AIS 4, ASM 1, ASM 2, and ADS-B signals).

HE360 respectfully requests expeditious action on this Application to allow HE360 to make the proposed changes for the cluster 2 launch scheduled for December 2020.

Respectfully submitted,

/s/ Michael Mineiro

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Counsel for HawkEye 360, Inc.

Dated: July 28, 2020

ATTACHMENT 1
Technical Certification

I, Nicole Hilliard, hereby certify, under penalty of perjury, that I am the technically qualified person responsible for the preparation of the engineering information contained in the technical portions of the foregoing application and the related attachments, that I am familiar with Part 25 of the Commission's rules, and that the technical information is complete and accurate to the best of my knowledge and belief.

/s/ Nicole Hilliard

Nicole Hilliard
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Dated: July 28, 2020

ATTACHMENT 2
Ownership Exhibit

The following are shareholders with 10% or more of the voting stock (issued & outstanding) in HawkEye 360, Inc. ("HE360"):

Name	Address	Citizenship	Voting Stock Percentage
A/NPP Portfolio Holdings LLC	1 World Trade Center New York, NY 10007	USA	33.33%
Razor's Edge Fund II, LP; Razor's Edge Fund II-A, LP[9]	1875 Explorer Street, Suite 560 Reston, VA 20190	USA	13.33%

The following individuals are directors of HE360:

John Serafini
Arthur Money
Nomi Bergman
Craig Searle
Steven Worley
Mark Spoto
Christopher Emerson

The following individuals are officers of HE360:

John Serafini, President and Chief Executive Officer
David Farnsworth, Treasurer and Chief Financial Officer
Stephanie Widzinski, Assistant Treasurer and Controller
Dennis Burnett, Secretary, Executive Vice President and General Counsel
Robert Rainhart, Chief Operating Officer
Alex Fox, Executive Vice President, Business Development, Sales & Marketing

All of the directors and officers of HE360 may be reached at the following address:

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[9] Razor's Edge Fund II, LP and Razor's Edge Fund II-A, LP are affiliates, and accordingly, HE360 has aggregated their interests for disclosure purposes.