



Request to Extend Launch Deadline

Umbra Lab, Inc. (“Umbra”) requests a sixty-day extension of Condition #21 of its license (Call Sign S3095),¹ requiring launch of all satellites by January 13, 2023. Additional time is required due to launch delays beyond Umbra’s control.

Umbra is authorized to launch and operate six satellites under its License. Umbra has successfully launched three of its six authorized satellites and plans to launch two more satellites on the upcoming rideshare mission scheduled for December 2022. Condition #21 of the License provides that “[t]his license will be null and void for any satellites not launched before January 13, 2023” (the “Launch Period”). Umbra is not able to meet the requirement for its sixth satellite due to a delay in the launch (until February 15, 2023), imposed by the launch services provider and beyond Umbra’s control. In an abundance of caution to allow for further minor launch delays, Umbra requests an extension, until March 14, 2023, of the deployment deadline specified in Condition #21.

Umbra understands that the Launch Period requirement is based on 47 C.F.R. §25.122(c)(2) and was imposed to ensure that all authorized satellites deorbit within six (6) years. Umbra will be able to comply with 47 C.F.R. §25.122(c)(2), regardless of launch date, by deorbiting the satellite within six (6) years using the propulsion system. Moreover, Umbra will not operate the satellite past the end of the License term (January 13, 2028). The later launch is not expected to materially shorten the satellite’s lifetime, if at all. Under nominal conditions, the satellite would still have nearly five (5) years to operate, which is close to the maximum expected mission lifetime for the satellite.

Given the modest extension of the Launch Period and Umbra’s ability to ensure that the satellite demises within the six-year License term through active deorbiting, Umbra submits that this brief extension of time is justified. Further, grant of this extension is in the public interest² because it would allow Umbra to continue providing its government and commercial customers with high-quality SAR imagery at a time when such imagery is in high demand as a result of world events.

¹ See Stamp Grant, Umbra, IBFS File No. IBFS File No. SAT-LOA-20210616-00080 (granted March 28, 2022) (the “License”).

² 47 C.F.R. §25.117(d)(2).