

GRANT
Xona Space Systems, Inc.
ICFS File Nos. SAT-LOA-20230711-00165,
SAT-AMD-20251119-00328

 GRANTED IN PART/DEFERRED IN PART * Space Bureau *with conditions	File #: SAT-LOA-20230711-00165; SAT-AMD-20251119-00328	
	Call Sign: <u>S3177</u> (or other identifier)	Grant Date: <u>07/31/2026</u>
	From: <u>See Conditions</u>	To: <u>See Conditions</u>
	Approved: <u>Carelyn A. Mahoney</u> Acting Division Chief Satellite Programs and Policy Division	

ICFS File No(s):	SAT-LOA-20230711-00165, ¹ and SAT-AMD-20251119-00328 ²	GRANTED IN PART/DEFERRED IN PART  Space Bureau Satellite Programs and Policy Division
Licensee/Grantee:	Xona Space Systems, Inc. (Xona)	
Call Sign:	S3177	
Satellite Name:	Xona System	
Orbital Location: (required station-keeping tolerance)	Non-geostationary satellite orbit (NGSO) in Low Earth Orbit (LEO) in a tiered Walker-Delta configuration at 1080 kilometer altitude	
Administration:	United States of America	
Nature of Service:	Radionavigation-Satellite Service (RNSS), Space Operation Service (SOS)	
Scope of Grant:	Authority to deploy and operate an RNSS constellation of 258 simultaneously operational NGSO satellites	
Previous Grant(s):	Authority to deploy and operate one Xona In-Orbit Validation (IOV) satellite in LEO ³	
Service Area(s):	Global (subject to limitations in certain frequency bands)	

¹ Xona Space Systems, Inc., ICFS File No. SAT-LOA-20230711-00165 (filed Jul. 11, 2023) (*Xona Application*). The Application was placed on public notice on September 1, 2023. *Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Accepted for Filing*, Public Notice, Report No. SAT-01754 (rel. Sept. 1, 2023). The GPS Innovation Alliance (GPSIA) filed a petition to deny the Application regarding Xona's proposed operations in the 1164-1215 MHz and 1559-1610 MHz bands. Petition to Deny of the GPS Innovation Alliance, ICFS File No. SAT-LOA-20230711-00165 (filed Oct. 2, 2023). GPSIA subsequently updated the Commission stating it no longer opposes Commission action on Xona's application for RNSS operations in the 1164-1215 MHz and 1559-1610 MHz bands, as long as the Commission conditions any grant of authority to Xona for these operations on compliance with U.S. and intergovernmental coordination obligations, other regulatory obligations under the International Telecommunication Union (ITU) Radio Regulations (e.g., ITU Resolution 609 (WRC-07) Consultation Meeting process), and conditions equivalent to those contained in the Commission's authorization for Xona's In-orbit Validation (IOV) satellite. See Letter from Lisa Dyer, Executive Director, GPS Innovation Alliance to Marlene H. Dortch, Secretary, FCC, at 1-3, n.5 (filed Nov. 26, 2025), citing Xona Space Systems, Inc., ICFS File No. SAT-LOA-20241215-00282 (granted Apr. 1, 2025) (*Xona IOV Grant*). The conditions we include in this authorization for Xona's RNSS operations in the GPS L1 (1164-1215 MHz) and L5 (1559-1610 MHz) bands are consistent with those GPSIA requested. *Id.* We find that Xona's RNSS transmissions will not cause harmful interference to existing GPS operations in GPS L1 and L5 bands because the received signal strengths of Xona's transmissions in these bands will be lower than the emissions limit that the Commission has previously determined is needed to protect GPS operations in the GPS L1 band from harmful interference due to unwanted emissions in the GPS L1 band. See *New LightSquared License Modification Applications*, Order and Authorization, 35 FCC Rcd 3772, 3837 (2020). We also note that Xona must comply with all Commission rules, including the ITU Radio Regulations incorporated into the Commission's rules, and there is no need to reiterate those requirements in conditions to this authorization.

² Xona Space Systems, Inc., ICFS File No. SAT-AMD-20251119-00328 (filed Nov. 26, 2025) (*Xona Amendment*). The Amendment to the Application was placed on public notice on January 9, 2026. *Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Accepted for Filing*, Public Notice, Report No. SAT-01964 (rel. Jan. 9, 2026). In response, AST & Science, LLC (AST SpaceMobile) and Ligado Networks LLC (Ligado) filed a Petition to Deny Xona's amended Application, opposing Xona's request to operate intersatellite link transceivers in the 1525-1559 MHz and 1626.5-1660.5 MHz bands. Petition to Deny of AST & Science, LLC and Ligado Networks LLC, ICFS File No. SAT-AMD-20251119-00328 (filed Feb. 9, 2026) (*AST SpaceMobile/Ligado Petition*). Xona filed an opposition, to which AST SpaceMobile and Ligado filed a reply. Opposition of Xona Space Systems, Inc. ICFS File No. SAT-AMD-20251119-00328 (filed Feb. 24, 2026) (*Xona Opposition*); Reply of AST & Science, LLC and Ligado Networks LLC, ICFS File No. SAT-AMD-20251119-00328 (filed Mar. 6, 2026) (*AST SpaceMobile/Ligado Reply*). We find that the conditions we include in this authorization sufficiently address the concerns raised by AST SpaceMobile and Ligado. See *infra* condition 3.

³ See generally *Xona IOV Grant*.

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Frequencies:	<u>RNSS:</u>⁴ 1559-1610 MHz (space-to-Earth) (center frequency: 1593.3225 MHz; bandwidth: 4 MHz) 1180.51625-1200.51625 MHz (space-to-Earth) (center frequency: 1190.51625 MHz; bandwidth: 20.0 MHz)⁵ <u>Telemetry, Tracking, and Command (TT&C):</u>⁶ 2200-2290 MHz (space-to-Earth) (outside of U.S. only) 2025-2110 MHz (Earth-to-space) (outside of U.S. only) <u>Inter-Satellite Links (ISLs):</u>⁷ 1525-1559 MHz (space-to-space) (receive ISL) 200 kHz bandwidth 1626.5-1660.5 MHz (space-to-space) (transmit ISL link) 200 kHz bandwidth 3700-4200 MHz (space-to-space) (receive ISL) <u>RNSS (receiving):</u> GPS L1 (center frequency: 1575.42 MHz; bandwidth: 30.69 MHz), L2 (center frequency: 1227.60 MHz; bandwidth: 30.69 MHz), and L5 (center frequency: 1176.45 MHz; bandwidth: 24 MHz) Galileo E1 (center frequency: 1575.42 MHz; bandwidth: 32 MHz); and E5 (center frequency: 1191.795 MHz; bandwidth: 32 MHz) signals
Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications and commitments set forth by the applicant or petitioner and with the Federal Communications Commission’s rules not waived herein. This grant is also subject to the following conditions: 1. Xona must complete coordination with potentially affected Federal Agencies and Services engaged in national security or safety of life services, through mutual exchange of system information to the extent possible consistent with national security requirements, prior to operating in the 2025-2110 MHz, 2200-2290 MHz, 1164-1215 MHz, 1559-1610 MHz, and 1180.5-1200.6 MHz bands, which are allocated on a primary basis to Federal services or are adjacent to primary Federal allocations. Xona must notify the Commission within 30 days after completion of coordination, with a copy to the National Telecommunications and Information Administration (NTIA) and the relevant Federal entity. Notification must be submitted via the FCC’s International Communications Filing System (ICFS). Two	

⁴ Xona plans to transmit signals for the purpose of radionavigation in the 1164-1215 MHz and 1559-1610 bands. *See* Xona Application, Narrative at 6, n. 9.

⁵ *See id.* at 6, n.10; Xona Amendment, Attach. B, Coordination Overview. We defer action, at Xona’s request, on Xona’s proposed use of the 5000-5010 MHz (Earth-to-space) band for feeder links and the 5010-5030 MHz (space-to-Earth) band for service links. We also note that Xona no longer requests use of the 8025-8400 MHz (space-to-Earth) band for service and TT&C links. *See* Xona Amendment, Narrative at 1.

⁶ *See* Xona Amendment, Narrative at 2, Attach. B, Coordination Overview. Xona is authorized to conduct TT&C operations with the following frequencies and bandwidths: 2200-2290 MHz (space-to-Earth) (center frequencies: 2263.5 MHz, bandwidth: 1.5 MHz; 2263.5 MHz, bandwidths: 0.81 MHz, 1.62 MHz, 5.0 MHz); 2025-2110 MHz (Earth-to-space) (center frequencies: 2032.25 MHz, 2091.75 MHz, 2104.75 MHz, 2050.0 MHz; bandwidth: 1.0 MHz; 2050.0 MHz; bandwidths 0.14, 0.27, 0.83 MHz).

⁷ *See Xona Amendment*, Narrative at 2-3; Xona Opposition, Annex-Representative L-Band ISL Channel Plan, Annex-1 to Annex-10.

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weeks prior to the start of any operations in such bands, Xona must provide contact information for a 24/7 point of contact for the resolution of any harmful interference to contacts provided by NTIA.

2. Xona must cooperate in good faith with requests for frequency coordination from the European Union's Galileo global navigation satellite system operator pursuant to any international obligations that the United States may have requiring such coordination. In the event agreement is reached that requires a modification to Xona's operations, Xona must submit an application requesting such modification and the removal of this condition; once such application is pending, Xona shall not be required to agree to or seek authorization for further modifications. In the event agreement cannot be reached between Xona and Galileo's operator, the Commission, in consultation as appropriate with U.S. government agencies, may either permit RNSS operations that the Department of State has determined are consistent with the international obligations of the United States or make a modification to the terms and conditions of the authorization following consultation with the Department of State and other U.S. government agencies such that this condition is fully satisfied.
3. We GRANT Xona's request for waiver of the U.S. Table of Frequency Allocations (U.S. Table),⁸ to receive inter-satellite signals from the Inmarsat satellite system in the 1525-1559 MHz (receive) band and to transmit inter-satellite signals to the Inmarsat satellite system in the 1626.5-1660.5 MHz (transmit) band.⁹ Xona states that its proposed operations in the 1525-1559 MHz band will not alter the interference environment as the received signals will be indistinguishable in its technical characteristics from signals transmitted in the allocated space-to-Earth direction.¹⁰ For the 1626.5-1660.5 MHz band, Xona states Inmarsat will assign channels to Xona consistent with its coordination agreements with other operators in the band to ensure that no other licensee will be transmitting at the same time and on the same frequency as Xona space-to-space transmissions and prevent harmful interference, and further that any space-to-

⁸ 47 CFR § 2.106(a). In the U.S. Table, the 1525-1559 MHz (space-to-Earth) and 1626.5-1660.5 MHz (Earth-to-space) bands are allocated to the Mobile-Satellite Service (MSS) on a primary basis for Federal and non-Federal use. The 1660-1660.5 MHz band is also allocated to the Radio Astronomy Service (RAS) on a primary basis for Federal and non-Federal use.

⁹ In its Petition, AST SpaceMobile and Ligado oppose Xona's proposed ISL operations in the 1525-1559 MHz and 1626.5-1660.5 MHz L-bands due to concerns, *inter alia*, about the potential for Xona's proposed 258 satellites to cause harmful interference to Ligado's existing operations and AST SpaceMobile's/Ligado's planned operations in the L-bands. AST SpaceMobile/Ligado Petition at 7. The Commission has previously assessed adjacent-channel interference from non-conforming ISLs into conforming MSS operations using ITU Rec. ITU-R M.1343-1 (6/2005), and in doing so, has treated interference as acceptable where ISL emissions are shown to fall below the ITU Rec. ITU-R M.1343-1 (6/2005) mask and result in a negligible interference-to-noise ratio and a correspondingly high carrier-to-noise ratio. *See, e.g.*, Loft Orbital, Stamp Grant, ICFS File No. SAT-LOA-20190807-00072, et al. at n.1 (granted Oct. 8, 2020); Astro Digital U.S., Inc., Stamp Grant, ICFS File No. SAT-LOA-20170508-00071, at n.3 (granted-in-part Dec. 14, 2017). *See generally* Essential technical requirements of mobile earth stations for global non-geostationary mobile-satellite service systems in the band 1-3 GHz, Rec. M.1343-1 (6/2005). Xona states that because a Xona ISL terminal is designed to comply with the technical requirements, including the out-of-channel emissions (OOCE) mask, of ITU Recommendation ITU-R M.1343-1 (6/2005), and will operate with an anticipated duty cycle estimated to be approximately 0.01%, any impact from Xona's OOCE on AST SpaceMobile's/Ligado's existing and planned operations is expected to be negligible. Xona Opposition at 8. Moreover, Xona notes, since the Xona System would operate at 1080 km while the AST SpaceMobile/Ligado system would operate at 690 km, Xona's terminals must be pointed upward to communicate with Inmarsat GSO satellites. Therefore, Xona's transmissions to Inmarsat will be directed away from Earth and lower altitude NGSO systems, including the proposed AST SpaceMobile/Ligado system, and reception by the Xona System satellites on these frequencies will not alter the interference environment, as the received signal will be indistinguishable in its technical characteristics from signals transmitted by Inmarsat in the allocated space-to-Earth direction. *Id.* at 9-10. We agree that Xona's ISL communications are unlikely to cause interference into AST SpaceMobile/Ligado's system and find that the conditions we have placed on this Xona System authorization serve as further protection against harmful interference.

¹⁰ Xona Application, Narrative at 18-19; Xona Amendment, Narrative at 5.

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space transmissions will be brief and infrequent and prevent harmful interference to other operators even absent the time- and frequency-based coordination built into Inmarsat's channel-assignment process.¹¹ We find Xona's ISL operations do not undermine the purpose of the rule and will support Xona's innovative system and thus serve the public interest.¹² Xona's intersatellite operations with Inmarsat are subject to the following conditions:

- a. Xona's operations in these bands must be on an unprotected, non-interference basis. Xona may not claim protection from nor cause harmful interference to any authorized users that are operating in accordance with the U.S. Table, 47 CFR § 2.106(a). Upon receiving a documented report of harmful interference, Xona must immediately cease the operation causing the harmful interference until the issue is resolved.
- b. Xona must coordinate its space-to-space ISL operations in the 1626.5-1660.5 MHz band with existing and future MSS licensees in the band.
- c. Xona must operate the Xona System to maintain its OOCE in the 1626.5-1660.5 MHz band below the OOCE limits specified in ITU Recommendation ITU-R M.1343-1 (6/2005) to avoid causing harmful interference to the MSS licensees' existing and planned operations in the 1626.5-1660.5 MHz band.
- d. Xona must not use the 1544-1545 MHz band for its inter-satellite operations.¹³
- e. Xona must not use the 1645.5-1646.5 MHz band for its inter-satellite operations.¹⁴
- f. This waiver is granted for a total of 16 satellites in the Xona system for purposes of confirming the functionality of Xona's GEO-to-LEO communications protocol and conducting TT&C and RNSS data relay.¹⁵ After these 16 satellites complete intersatellite operations, Xona may not conduct

¹¹ *Id.* at 19. Xona also states that its satellites in LEO will briefly transmit ISL terminal functionality to Inmarsat satellites on a link that allows Inmarsat to maintain positive control and dynamically assign coordinated frequency channels for the ISL terminals to avoid co-channel operation with incumbent users, ensuring that no other licensee will be transmitting at the same time on the same frequency as Xona's space-to-space transmissions, and preventing harmful interference. Xona Opposition at 8, n.22.

¹² The Commission's rules may be waived for good cause shown, in whole or in part, at any time by the Commission. *See* 47 CFR § 1.3. Waivers must articulate an "appropriate general standard," show special circumstances warranting a deviation from the general rule, and show that such a deviation will serve the public interest. *See Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969)); *see also Network IP, LLC v. FCC*, 548 F.3d 116, 127 (D.C. Cir. 2008).

¹³ The MSS allocation in the U.S. Table, in which the Inmarsat MSS system operates and encompasses the 1525-1559 MHz band, does not include a space-to-space directional indicator, and, under section 2.106(a), (b)(356) of the Commission's rules, MSS use of the 1544-1545 MHz band is limited to distress and safety communications (*see* ITU Article 31). 47 CFR § 2.106(a), (b)(356).

¹⁴ The MSS allocation in the U.S. Table, in which the Inmarsat MSS system operates and encompasses the 1626.5-1660.5 MHz band, does not include a space-to-space directional indicator, and, under section 2.106(a), (b)(375) of the Commission's rules, use of the 1645.5-1646.5 MHz band for ISL is limited to distress and safety communications (*see* ITU Article 31). 47 CFR § 2.106(a), (b)(375). We note that Inmarsat is not a party to this application and therefore these waivers do not apply to any operations of the Inmarsat system for space-to-space inter-satellite communications in the 1525-1559 MHz and 1626.5-1660.5 MHz frequency bands.

¹⁵ Xona states that its satellites in LEO will transmit only ISL terminal functionality data to Inmarsat satellites in GEO exclusively to confirm that its GEO-to-LEO communications protocol is functioning properly, with a duty cycle estimated to be approximately 0.01%. No more than 16 satellites in the Xona System will receive transmissions from Inmarsat's GEO satellites on a limited basis for TT&C and RNSS data relay to enable Xona's RNSS payload operations. *Id.* at 7-8; Xona Amendment, Technical Narrative at 5.

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subsequent intersatellite operations with any other satellites in the Xona System.¹⁶ Under section 2.106(a), (c)(342) of the Commission's rules, Xona must take all practicable steps to protect the RAS in the 1660.0-1660.5 MHz band from harmful interference. Radio astronomy uses the 1660.0-1660.5 MHz band for spectral line observations, and emissions from spaceborne stations can be particularly serious sources of interference to the radio astronomy service.¹⁷ For information exchange about and coordination with respect to Radio Astronomy stations operating in the 1660.0-1660.5 MHz band or optical astronomy coordination, Xona should contact the U.S. National Science Foundation at esm@nsf.gov.

- g. For operations overlapping in the 1660-1660.5 MHz band, Xona spacecraft transmissions (space-to-space) must cease operation when within line-of-sight of Goldstone, CA (35° 14' 18" N, 116° 46' 40" W).
- 4. Xona's request for a waiver of the U.S. Table, 47 CFR § 2.106(a), to use the 3700-4200 MHz band for GEO-to-LEO (space-to-space) ISLs with SES¹⁸ GEO satellites¹⁹ on an unprotected, non-interference basis is GRANTED, for the limited purpose as conditioned herein.²⁰ Although the allocations in this frequency band do not include a directional indicator for space-to-space communications, reception by the Xona System satellites on these frequencies will not alter the interference environment, as the received signal will be indistinguishable in its technical characteristics from signals transmitted by SES in the allocated 3700-4200 MHz space-to-Earth direction that SES earth stations normally receive.²¹ Xona must accept the frequency assignments from SES on a non-interference, non-protected basis. Xona shall not claim protection from nor cause harmful interference to any authorized users that are operating in accordance with the U.S. Table, 47 CFR § 2.106(a). Upon receiving a documented report of harmful interference, Xona must immediately cease the operation causing harmful interference until the issue is resolved.
- 5. In the 1164-1215 MHz band, Xona must operate on an unprotected, non-interference basis and shall not claim protection from stations of the Aeronautical Radionavigation Service (ARNS) in the 1164-1215 MHz band.²²

¹⁶ AST SpaceMobile/Ligado argue that Xona should be required to amend its application to limit the ISL communications to this smaller sub-set of satellites and to fully describe the mission of these satellites. AST SpaceMobile/Ligado Reply at 4-5. We find that it is not necessary for Xona to further amend its Application to specify the reduced number of satellites that would operate in the L-bands, as this limit is directly incorporated into Xona's granted authorization.

¹⁷ 47 CFR § 2.106(a), (c)(342).

¹⁸ We note that SES is not a party to this application and therefore this waiver does not apply to any operations of SES system(s) for space-to-space inter-satellite communications in the 3700-4200 MHz frequency band.

¹⁹ See Xona Amendment, Narrative at 8. SES will assign the center frequencies, subject to change over time based on its regulatory, coordination, and operational requirements. *Id.* at 9.

²⁰ In the U.S. Table, the 3700-4000 MHz band is allocated to the Fixed Service (FS) and Mobile except aeronautical mobile Service (MS except aero), on a primary basis for non-Federal use, the 4000-4200 MHz band is allocated to the FS and Fixed-Satellite Service (space-to-Earth) on a primary basis for non-Federal use, and the 3700-4200 MHz band does not include a space-to-space directional indicator. Furthermore, in the 3700-4200 MHz band, under section 2.106(a), (d)(182)(i) of the Commission's rules, no new space station authorizations or new petitions for market access shall be accepted for filing after June 21, 2018, other than applications by existing operators in the band seeking to make more efficient use of the 4000-4200 MHz band. 47 CFR § 2.106(a), (d)(182)(i). Applications for extension, cancellation, replacement, or modification of existing space station authorization in the band will continue to be accepted and processed normally.

²¹ Xona Amendment, Narrative at 8-9.

²² 47 CFR § 2.106(a), (b)(328)(i); ITU Resolution 609 (REV.WRC-07).

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6. Xona's transmissions in the 2025-2110 MHz and 2200-2290 MHz bands may only be made using specific frequencies/earth stations coordinated with Federal Agencies, including the National Aeronautics and Space Administration (NASA), Department of Commerce/National Oceanic and Atmospheric Administration (DOC/NOAA), Department of the Navy (DON), and the United States Air Force Spectrum Management Office (AFSMO). Any use of Federal government-sponsored earth stations shall be coordinated by Xona's federal government customers with AFSMO (jimmy.nguyen@us.af.mil), NASA (HQ-SatCoord@mail.nasa.gov), and DOC/NOAA (spectrum.coordinator@noaa.gov). Transmissions within the space operation service shall be strictly limited to durations when the Xona System space stations are visible to the corresponding earth station locations listed in the Appendix of this grant, noting any additional restrictions within this grant. Xona must provide the FCC with an updated list of coordinated non-Federal earth stations within ten (10) business days following any changes to this list.
7. Xona shall coordinate with the operator(s) of the U.S. Global Positioning System (GPS) and Wide Area Augmentation System (WAAS) systems to ensure maximum compatibility and to avoid causing any harmful interference to these systems from Xona's operations. The Department of the Air Force POCs for GPS are Insang Jang (in.jang@spaceforce.mil) and Jimmy Nguyen (jimmy.nguyen@us.af.mil). The Federal Aviation Administration WAAS operator is Jason Burns (jason.burns@faa.gov). In the event of any interference, either from complaints or reports received or its own observation, Xona shall immediately cease all operations until the interference is resolved. Xona is required to inform the Commission within three days of such occurrence(s) explaining measures taken to mitigate the interference.
8. Xona must provide the FCC and other Federal agencies with the initial orbital parameters (e.g., operating altitudes, inclination angle) within 30 days following launch. Notification shall be provided to AFSMO (jimmy.nguyen@us.af.mil), NASA (HQ-SatCoord@mail.nasa.gov) and DOC/NOAA (spectrum.coordinator@noaa.gov). In the event that changes to orbital parameters are required, Xona must complete coordination in advance of any such changes with AFSMO, NASA, and DOC/NOAA, and upon successful completion of coordination notify the FCC of the update within five (5) business days.
9. Xona's request for waiver of sections 25.156 and 25.157 of the Commission's rules, which provide for the processing of applications for "NGSO-like satellite systems" under a modified processing round framework, is GRANTED. 47 CFR §§ 25.156 and 25.157. Xona explains that the Xona System can co-exist with existing and future co-frequency systems and it agrees to coordinate with future entrants. Given the opportunity for additional entrants to operate in this band, as well as the conditions included herein, we find that granting the request for waiver in this instance does not undermine the purpose of the processing round rules. We note that granting this waiver and authorization outside of a processing round does not confer on Xona higher priority with respect to later authorized systems, granted either in a processing round or not. Xona must coordinate with existing and future users of the bands in which it is authorized.
10. Xona's participation in the ITU Resolution 609 process will address and ensure compliance with any aggregate equivalent power flux-density (EPFD) for planned and operational RNSS systems.²³ Xona shall comply with any agreements reached under the coordination requirements of ITU Resolution 609 (Rev. WRC-07) regarding use of the 1164-1215 MHz band. 47 CFR 2.106(a), (b)(328)(i); ITU Resolution 609 (WRC-07) resolves 1-10.

²³ Xona Amendment, Narrative, at 16; *see* Letter from George V. John, Counsel to Xona, to Marlene H. Dortch, Secretary, FCC at 2 (filed Jan. 24, 2026) (Xona January 2026 Letter).

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11. Xona's request for a waiver of section 25.112(a)(1) is DISMISSED as moot. Information not included in Xona's application was subsequently submitted and therefore we find that the waiver is not necessary.²⁴
12. Xona is authorized to deploy up to the initial 16 satellites, as conditioned herein.²⁵ Prior to the deployment of the remainder of the authorized Xona System satellites or replenishment of any Xona System satellites, Xona must submit and obtain approval of an application for modification containing an updated orbital debris mitigation demonstration, specifically addressing the re-entry casualty risk associated with the deployment of future Xona satellites.²⁶
13. This authorization is also subject to the following requirements:
 - a. Xona must post a surety bond in satisfaction of 47 CFR § 25.165(a)(1) &(b) no later than August 31, 2026 and thereafter maintain on file a surety bond requiring payment in the event of default in an amount, at a minimum, determined according to the formula set forth in 47 CFR § 25.165(a); and
 - b. Xona must launch 50% of the maximum number of proposed space stations, place them in assigned orbits, and operate them in accordance with this space authorization no later than July 31, 2032, and Xona must launch the remaining space station necessary to complete its authorized service constellation, place them in their assigned orbits, and operate each of them in accordance with the authorization no later than July 31, 2035. 47 CFR § 25.164(b).

Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned.

This action is taken pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 CFR § 0.261, and is effective upon release.

Station licenses are subject to the conditions specified in Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(h).

Action Date:	July 31, 2026	
Term Dates	From: See Conditions	To: See Conditions

Approved:

Carolyn A. Mahoney
Acting Chief, Satellite Programs and Policy Division

²⁴ Xona January 2026 Letter at 2.

²⁵ See Letter from George V. John, Counsel to Xona, to Jonathan R. Markman, Acting Division Chief, Satellite Programs and Policy Division, FCC, at 3 (filed May 8, 2026).

²⁶ 47 CFR § 25.114(d)(14)(vii)(C). The U.S. Government's Orbital Debris Mitigation Standard Practices (ODMSP) states that for large constellations (greater than 100 satellites), the preferred disposal options are a direct reentry (reentry trajectory) or moving to a heliocentric, Earth-escape orbit. The ODMSP also states that for large constellations, the program should limit the cumulative reentry human casualty risk from the constellation, and that all programs should consider design-for-demise and other measures, including reusability and targeted reentry away from landmasses, to further reduce reentry human casualty risk.

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APPENDIX

Receive Earth Stations:

Puertollano, Spain
Punta Arenas, Chile
Awarua, New Zealand
Hartebeesthoek, South Africa
Santa Maria, Portugal
Nangetty, Australia
Athens, Greece
Jeju, South Korea
Maspalomas, Spain
Mauritius
Global (RNSS receivers)

Transmit Earth Stations:

Puertollano, Spain
Punta Arenas, Chile
Awarua, New Zealand
Hartebeesthoek, South Africa
Santa Maria, Portugal
Nangetty, Australia
Athens, Greece
Jeju, South Korea
Maspalomas, Spain
Mauritius