

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of	)	ICFS File Nos.
	)	SAT-MOD-20251118-00324
HawkEye 360, Inc.	)	SAT-AMD-20260512-00195
	)	
Application to Amend Application	)	Call Sign: S3042

AMENDMENT APPLICATION

HawkEye 360, Inc. (“HE360”) hereby amends its pending modification application to reflect the following changes to Cluster 15 of the satellite constellation (“HE360 Constellation”), resulting from a change in the launch deployment parameters for the Cluster 15 satellites:¹

- an increase in the maximum deployment and operational altitude (perigee and apogee) from 600 km to **610 km**; and
- the addition of drag sails to the three spacecraft to ensure compliance with the 5-year deorbit rule.

HE360 is not requesting any other changes to its license or authorized satellite operations in this amendment application and certifies that such operations remain unchanged.² HE360 submits that grant of this application will serve the public interest by allowing HE360 to deploy its Cluster 15 satellites consistent with recently revised launch deployment parameters, which are

¹ See Application, HawkEye 360, Inc., ICFS File No. SAT-MOD-20251118-00324 (filed December 12, 2025).

² For the avoidance of doubt, the pending HE360 modification application seeks to increase the number of HE360 clusters in the polar, sun-synchronous orbit from nine to twelve and decrease the number of HE360 clusters in the mid-inclination orbit from ten to seven; authorize HE360 to deploy, as part of any of its twenty HE360 clusters in the HE360 Constellation, either the originally authorized “Hawk” satellite or the smaller form factor “Kestrel” satellite; expand the inclination range of the authorized mid-inclination orbit from 35-50 degrees to 35-55 degrees; expand the identified sensing capability of the HE360 Constellation from aa 30 MHz to 18 GHz range to a 2 MHz to 40 GHz range; add two X-band transmitter antennas to the Hawk satellites beginning with Cluster 15; and update the list of HE360 Earth stations coordinated with Federal agencies.

beyond HE360's control. HE360 requests grant of the application prior to August 1, 2026, to ensure that Cluster 15 satellites are timely authorized before the scheduled launch.

Attached are the following exhibits in support of this application:

Exhibit 1 – Interference Analysis

Exhibit 2 – Orbital Debris Assessment Report (ODAR)

Exhibit 3 – Ownership Information

Discussion

HE360 is authorized to operate its constellation with operational apogee and perigee altitudes from 250 km to 600 km.³ The HE360 Cluster 15 satellites are manifested on a rideshare launch with a planned payload deployment at 590 km +/- 20 km altitude, which would exceed the 600 km maximum altitude. Accordingly, HE360 seeks to change its license to accommodate a worst-case deployment altitude of 610 km x 610 km for the Cluster 15 satellites⁴ and to permit operation of those satellites.

To ensure compliance with the FCC's 5-year deorbit requirement, HE360 will include drag sails on the spacecraft and conduct a beginning-of-life altitude lowering maneuver. The drag sails are attached to the solar wings and will be automatically deployed with the solar wings, as part of the normal solar wing deployment process.⁵ As a result, the drag sails do not increase or otherwise create new reliability concerns.

³ See Grant, HawkEye 360, Inc. ICFS File Nos. SAT-MOD-20250910-00267 (granted February 10, 2026).

⁴ For the avoidance of doubt, HE360 does not request in this application general authority to launch and operate additional satellite clusters at altitudes higher than 600 km.

⁵ The solar wings have been used on all HE360 clusters since Cluster 2.

HE360 will also execute, as necessary, orbit lowering maneuvers at the beginning of life, as part of the Cluster 15 commissioning, to bring the spacecraft down to an altitude that will comply with a 5-year deorbit requirement following a 5-year nominal mission life. HE360 plans to determine the final target orbit for beginning-of-life operations based on the deployment orbit. As discussed in more detail in the attached ODAR, such maneuvers would include perigee lowering, circular lowering, or some combination to ensure compliance with the 5-year deorbit requirement.⁶ Details regarding the drag sails and the orbital debris mitigation for Cluster 15 are included in Exhibit 2.

Respectfully submitted,

/s/ Dennis Burnett

Tony Lin
Jason Chun
Cooley LLP
1299 Pennsylvania Avenue NW, Suite 700
Washington, DC 20004

Counsel for HawkEye 360, Inc.

Dennis Burnett
EVP, General Counsel
Ryan Fielder
Sr. Director, Engineering Programs
HawkEye 360, Inc.
450 Springpark Place, Suite 500
Herndon, VA 20170
+1 571-203-0360

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⁶ For example, based on current analyses, the altitude required to achieve compliance would be 610 km x 540 km (with perigee-only lowering) or 575x575 km (with circular lowering).

Technical Certification

I, Ryan Fielder, 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/ Ryan Fielder

Ryan Fielder
Sr. Director, Engineering Programs
HawkEye 360, Inc.
450 Springpark Place, Suite 500
Herndon, VA 20170
+1 (571) 668-0042

Dated: May 26, 2026