

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telesat LEO U.S. Inc.	)	Call sign S2976
	)	
Amendment to Application for	)	File No. SAT-AMD-20260625-00252
Modification of U.S. Market Access	)	
Grant for Telesat's NGSO Constellation	)	
	)	

**Legal Narrative for Application to Amend Application to Modify the
Market Access Grant for Telesat's NGSO Constellation**

I. Introduction

Telesat LEO U.S. Inc. ("Telesat") is developing a low-Earth orbit ("LEO") Ka-band NGSO constellation known as Telesat Lightspeed. On November 3, 2017, the Commission granted Telesat's U.S. market access petition (hereafter the "Grant"¹) for the initial 117 satellites of the Telesat Lightspeed constellation. Telesat has pending in the second processing round a modification application, as amended and supplemented ("the Second Round Modification Application"), for a redesign of Telesat Lightspeed, among other things, to change the number of satellites in the constellation to 300 LEO satellites.²

¹ *Telesat Canada Petition for Declaratory Ruling to Grant Access to the U.S. Market for Telesat's NGSO Constellation*, Order and Declaratory Ruling, 32 FCC Rcd 9663 (2017).

² For Telesat's initial second round application and the amendments to the application that have been accepted for filing, see *Satellite Policy Branch Information: Space Station Applications Accepted for Filing*, Public Notice, Report No. SAT-01648, Telesat LEO Inc., SAT-MPL-20200526-00053, SAT-APL-20210104-00002, and SAT-APL-20220616-00059 (rel. Jul 15, 2022); *Satellite Policy Branch Information: Space Station*

Now pursuant to the Commission's *Public Notice* initiating a third processing round for additional non-geostationary satellite orbit ("NGSO")-like satellite applications in bands that include the Ka-band³ and pursuant to Section 25.116 of the Commission's rules,⁴ Telesat hereby files this amendment to its application for modification of its Grant (the "Third Round Amendment"): (i) to add a mobile-satellite service ("MSS") designation to Telesat's Grant so as to allow it to provide both MSS and fixed-satellite service ("FSS") in the 19.7-20.2 GHz and 29.5-30.0 GHz bands in which Telesat is already authorized to provide FSS service; and (ii) to authorize Telesat to access the 19.3-19.7 GHz band (space-to-Earth). Together, these changes will allow Telesat greater operational flexibility through frequency diversity of downlink spectrum options as well as greater overall downlink capacity to meet anticipated demand for its customers.

Telesat requests that this Third Round Amendment be processed separately from its Second Round Modification Application.⁵ Telesat's implementation of Telesat Lightspeed as described in the Second Round Modification Application is not

Applications Accepted for Filing, Public Notice, Report No. SAT-01775, Telesat LEO Inc., SAT-MPL-20231026-00263 (rel. Nov. 17, 2023); *Satellite Policy Branch Information: Space Station Applications Accepted for Filing*, Public Notice, Report No. SAT-01903, Telesat LEO U.S. Inc., SAT-APL-20231026-00264 (rel. Mar. 21, 2025); *Satellite Policy Branch Information: Space Station Applications Accepted for Filing*, Public Notice, Report No. SAT-01984, Telesat LEO U.S. Inc., SAT-APL-20260202-00075 (rel. Mar. 20, 2026). *See also* Letter of Apr. 11, 2026 from Joseph A. Godles, Attorney for Telesat LEO U.S. Inc. to Ms. Marlene H. Dortch, Secretary, FCC regarding Supplement to SAT-MPL-20200526-00053, SAT-APL-20210104-00002, SAT-APL-20220616-00059, SAT-APL-20231026-00264; and SAT-APL-20260202-0007.

³ *Space Bureau Opens Processing Rounds, Cut-Off Established for Additional NGSO-Like Satellite Systems in the Ku- and Ka-Bands and V-Band*, Public Notice, DA 26-552 (rel. June 5, 2026).

⁴ 47 C.F.R. § 25.116.

⁵ Telesat is styling this filing as an amendment to its Second Round Modification Application, even though it is a third round application, following consultation with the Space Bureau staff.

contingent on the outcome of the Third Round Amendment. There is therefore no reason to delay Commission action on the Second Round Modification Application pending consideration of this Third Round Amendment in connection with the Third Processing Round.

Except as identified in this Third Round Amendment, including the attached Technical Appendix and updated Schedule S, there is no change to Telesat Lightspeed's overall design, technical information, or legal and technical qualifications, including with respect to its orbital debris mitigation plan, and the public interest benefits presented in the Second Round Modification Application remain.

II. INDIVIDUAL BAND ANALYSIS

19.7-20.2 GHz and 29.5-30.0 GHz

Telesat's Grant and its Second Round Modification Application include FSS operations in the 19.7-20.2 GHz and 29.5-30.0 GHz bands. Telesat hereby seeks to add an MSS service designation to its Grant in these bands, which will give Telesat additional operational flexibility. To the extent necessary, Telesat requests waiver of the Commission's Ka-band plan to add this MSS service designation. Although these frequencies are allocated for FSS and MSS domestically and internationally, an MSS service designation for these bands is not included in the Commission's Ka-band plan.⁶

On multiple occasions, the Commission has found that it is in the public interest to grant licenses and market access to provide MSS, in addition to FSS, in the 19.7-20.2

⁶ *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 7809 (2017).

and 29.5-30.0 GHz bands.⁷ Like others granted such rights, Telesat's MSS operations will be supported exclusively by directional antennas and will therefore have the same technical characteristics as its FSS earth stations in motion ("ESIMs"), which Telesat will be seeking authority for in a blanket earth station license application. Therefore, Telesat's NGSO MSS operations will create no additional interference; indeed, would be indistinguishable from Telesat's NGSO FSS operations in the 19.7-20.2 GHz and 29.5-30.0 GHz bands to be conducted with ESIMs.

Good cause thus exists to permit Telesat MSS operations in these bands consistent with the terms and conditions that the FCC has specified for other MSS operators in the band, including complying with the applicable EPFD limits for FSS operations, even when these operations are conducted within the MSS, and conducting such MSS operations on a non-interference, unprotected basis with respect to other FSS operations in these bands.⁸

19.4-19.6 GHz

Telesat proposes to use the 19.4-19.6 GHz band for NGSO MSS feeder links for Telesat Lightspeed. Under the FCC's Ka-band plan, the 19.4-19.6 GHz band is

⁷ *Space Exploration Holdings, LLC, Request for Deployment and Operating Authority for the SpaceX Gen2 NGSO Satellite System, Application for Authority for Modification of the SpaceX NGSO Satellite System, FCC Call sign S2992/3069, ICFS File Nos. SAT-LOA-20200526-00055, SAT-AMD-202 10818-00105, SAT-AMD-2022 1216-00175, SAT-AMD-20241017-00228, SAT-MOD-20241011-00224, Authorization and Order, DA 26-36, Fn. 15 (rel. Jan 9, 2026) ("SpaceX Gen2 Order"); Kuiper Systems, LLC Application for Authority to Deploy and Operate a Ka-band Non-Geostationary Satellite Orbit System, Order and Authorization, 35 FCC Rcd 8324, 8328-8330 (2020) ("Amazon Order"); O3b Limited, Request for Modification of U.S. Market Access for O3b Limited's Non-Geostationary Satellite Orbit System in the Fixed-Satellite Service and in the Mobile-Satellite Service, Order and Declaratory Ruling, 33 FCC Rcd 5508, 5516 (2018) ("O3b Order").*

⁸ See, e.g., *Amazon Order* 35 FCC Rcd at 8329-8330.

designated for fixed services and NGSO MSS feeder links for space-to-Earth transmissions in the United States.⁹ As discussed above, Telesat Lightspeed will, in addition to FSS, provide MSS in the 19.7-20.2 GHz and 29.5-30.0 GHz bands, and accordingly, its use of the 19.4-19.6 GHz band for MSS feeder links (space-to-Earth) conforms with the Ka-band plan.¹⁰ Further, as demonstrated in the associated Technical Appendix,¹¹ Telesat will coordinate, to the extent required, with authorized operations in this band. The Commission has granted multiple applications for use of the 19.4-19.6 GHz band on the same basis.¹²

19.3-19.4 GHz and 19.6-19.7 GHz Bands

Telesat's proposed use of 19.3-19.4 GHz and 19.6-19.7 GHz bands for NGSO MSS feeder links and, on a secondary non-interference basis vis-à-vis authorized primary users of the bands, for FSS, is consistent with the Ka-band plan. As set forth in the attached Technical Appendix, Telesat will comply with the applicable power flux-density limits governing NGSO FSS systems.¹³ Further, as demonstrated in the associated Technical Appendix,¹⁴ Telesat will coordinate, to the extent required, with authorized operations in these bands.

⁹ 47 C.F.R § 2.106 NG 166. See also *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 7809 (2017).

¹⁰ Telesat does not propose to operate user links in the 19.4-19.6 GHz band.

¹¹ See Technical Appendix, Exhibit 4.

¹² See *Amazon Order*, 35 FCC Rcd at 8324; *O3b Order*, 33 FCC Rcd at 5515-5517; see also *SpaceX Gen2 Order*, Frequencies at pp 3-5.

¹³ Cite §25.208

¹⁴ See Technical Appendix, Exhibit 4.

Section 25.156(d)(4), Separate Processing of Feeder Link Applications

If and to the extent required, Telesat requests waiver of Section 25.156(d)(4) of the FCC's rules, which by its terms would require separate processing of Telesat's request for access to feeder link spectrum and its request for access to associated service link spectrum. As is evident from the *Processing Round Notice*, which includes both feeder link frequencies and service link frequencies, the Commission has already determined that feeder link and service link requests in this processing round should be processed together. Moreover, the Commission has granted similar requests for waiver before and on a comparable basis.¹⁵ Accordingly, if and to the extent required, good cause exists here to grant the requested waiver.

III. ITU Filings and Canadian Authorization

Updated ITU and Canadian license information is shown in the Technical Appendix.

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July 6, 2026

¹⁵ *Amazon Order*, 35 FCC Rcd at 8343; *Audacy Corporation Application for Authority to Launch and Operate a Non-Geostationary Medium Earth Orbit Satellite System in the Fixed- and Inter-Satellite Services*, Order and Authorization, 33 FCC Rcd 5554, 5565-66 (2018).