Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	ICFS File Nos.:
	)	
ASTRA (GB) LIMITED	)	SAT-MPL-20240510-00099
	)	SAT-AMD-_____
Application to Modify U.S. Market Access Grant for the O3b Satellite System	)	Call Sign: S2935

AMENDMENT

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AMENDMENT

ASTRA (GB) Limited, the successor-in-interest to O3b Limited (together, "SES"),[1] hereby amends its pending milestone extension request to seek a further limited extension of the 50% milestone deadline for the O3b system to May 15, 2027 (the "Amendment").[2] SES's pending milestone extension request had sought an extended 50% milestone date of August 7, 2026. While SES has made substantial progress toward deploying 50% of its authorized satellites by August 7, 2026, it will fall short of that objective by a single satellite in a small subset of frequencies due to unforeseen technical issues discovered during ground testing. Those issues have now been resolved by the manufacturer, and the satellite is scheduled to be launched in September 2026. The satellite will be ready for service by May 2027 after six months of orbit raising and once in-orbit testing is complete. Accordingly, SES requests a further extension of the 50% milestone to May 15, 2027, to account for this additional delay beyond SES's control.[3] Grant of SES's

[1] In 2025, O3b Limited, a wholly owned subsidiary of SES S.A., assigned its U.S. market access grant and associated amendments to ASTRA (GB) Limited, another wholly owned subsidiary of SES S.A. *See* ICFS File No. SAT-MOD-20250430-00114 (granted July 17, 2025).

[2] 47 C.F.R. § 25.117(e); *see also* Application of O3b Limited, ICFS File No. SAT-MPL-20240510-00099 (filed May 10, 2024) ("2024 Modification Request") (requesting to modify SES's 2018 U.S. market access authorization to extend the 50% milestone deadline to August 7, 2026, and the 100% milestone to August 7, 2029).

[3] For clarity, SES seeks to retain its originally requested August 7, 2026, interim milestone deadline for all satellites other than the one subject to this request. *See generally* 2024 Modification Request.

extension request, as amended, is consistent with FCC precedent and will serve the public interest by enabling the O3b system to continue providing enhanced capacity, resilience, and service quality to its U.S. customers. SES also hereby withdraws its request to extend the final milestone requirement and surrenders its authorization for 10 inclined satellites (referred to as the "O3bI" satellites in SES's 2018 U.S. market access authorization).[4]

I. INTRODUCTION AND BACKGROUND

In 2018, the Commission granted U.S. market access to SES to add 30 satellites to its non-geostationary satellite ("NGSO") constellation, which has provided high-throughput, low-latency Ka-band capacity to users around the world.[5] The added satellites would operate on a range of Ka-band frequencies due to updates in technology allowing enhanced capacity and coverage.[6] The result was that not all satellites in the O3b system would use all authorized frequency bands. In granting U.S. market access, the Commission divided SES's system into four categories based on the number of satellites capable of operating in each set of frequency bands and calculated a milestone requirement for each category.[7] Accordingly, the Commission imposed the following condition[8]:

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[4] *See 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 (2018) ("*O3b Market Access Grant*").

[5] *Id.* (granting U.S. market access for 26 additional satellites); Stamp Grant, Application of O3b Limited, ICFS File No. SAT-MOD-20160624-00060 (granted Feb. 28, 2018) (granting U.S. market access for 4 satellites). The Commission applied the milestone requirements to all 30 satellites. *See O3b Market Access Grant* ¶¶ 43, 66.

[6] *See* Amendment Applications of O3b Limited, ICFS File Nos. SAT-AMD-20161115-00116 (filed Nov. 15, 2016) and SAT-AMD-20171109-00154 (filed Nov. 24, 2017) (amending SES's U.S. market access request due to the advance technical capabilities of the proposed added satellites).

[7] *O3b Market Access Grant* ¶¶ 43, 66(b).

[8] *Id.* ¶ 66(b).

> b. [SES] must launch the space stations, place them in the assigned orbits, and operate them in accordance with this grant of U.S. market access and 47 CFR § 25.164(b). Section 25.164(b) requires [SES] to launch and operate 50 percent of its satellites no later than June 7, 2024. Accordingly, as discussed in paragraph 43, [SES's] satellites must be launched and operated [within 6 years of grant] according to the following schedule:
>
> 1. […] 15 satellites in the following bands: 17.8-18.6 GHz, 18.8-19.3 GHz, 27.6-28.4 GHz, and 28.6-29.1 GHz;
>
> 2. […] 11 satellites in the following bands: 19.3-19.7 GHz, 28.4-28.6 GHz, and 29.1-29.5 GHz;[9]
>
> 3. […] 13 satellites in the following bands: 19.7-20.2 GHz and 29.5-30.0 GHz;
>
> 4. […] 6 satellites in the following bands: 37.5-42.0 GHz and 47.2-50.2 GHz.[10]

SES has worked diligently to build its system, but, as explained in its pending modification request, deployment was affected by system design, supply chain, manufacturing, and technical issues outside SES's control.[11] For those reasons, in May 2024, SES requested an extension of the 50% milestone from June 7, 2024, to August 7, 2026, and the 100% milestone from June 7, 2027, to August 7, 2029.[12] Since that extension request, SES has continued launching and deploying its constellation. However, due to a technical issue discovered during satellite ground testing, SES will fall one satellite short of meeting its target of deploying 50% of its authorized satellites in a small subset of frequency bands by the previously requested August 7, 2026, date. The technical issue has now been resolved, and the satellite is now scheduled for launch in September 2026 and expected to be in service by May 2027. SES respectfully requests a limited additional extension

[9] The *O3b Market Access Grant* omitted the 27.5-27.6 GHz band from the listed milestone requirements. *See id*. Because SES requested access to this band for the same satellites as the 19.3-19.7 GHz, 28.4-28.6 GHz, and 29.1-29.5 GHz bands, SES includes 27.5-27.6 GHz in the 11-satellite requirement. *See id.* ¶¶ 6, 66(b)(2).

[10] SES relinquished its authority to serve the U.S. using V-band spectrum in 2022. *See* Letter from Suzanne Malloy, O3b Limited, to Marlene H. Dortch, FCC, ICFS File No. SAT-AMD-20170301-00026 (filed Aug. 31, 2022).

[11] *See* 2024 Modification Request, Legal Narrative.

[12] *See id.*

of the 50% milestone in paragraph 66(b)(2) of SES's market access authorization for the delayed launch of this satellite.

II. A LIMITED EXTENSION OF THE INTERIM MILESTONE DEADLINE IS JUSTIFIED

Satellite operators may request a milestone deadline extension by demonstrating that additional time is required due to unforeseen circumstances beyond the operator's control or that unique and overriding public interest concerns justify an extension.[13] In reviewing an extension request, the Space Bureau ("Bureau") may consider such factors as the progress the licensee has made toward meeting the 50% milestone; how many satellites are in operation; the planned deployment schedule for undeployed satellites; any investments or expenditures in the authorized system; the length of the requested extension; and the likelihood that the licensee will meet the final milestone to launch the entire constellation.[14] For the reasons discussed below, the Bureau should approve SES's request for a limited further extension of its interim milestone in light of SES's significant progress in deploying its system and its plans to deploy the remaining satellite.

A. Additional Time Is Required for Reasons Outside of SES's Control

In May 2024, SES requested an extension of its 50% milestone to August 7, 2026. SES would have met the August 7, 2026, deadline but for unforeseen technical issues delaying the launch of a single satellite that were discovered in the final stages of ground testing.

SES now seeks a further extension of its 50% interim milestone to May 15, 2027. As shown in Table 1, SES has made substantial progress—it has met the interim milestone requirement for

[13] 47 C.F.R. § 25.117(e); *Kuiper Systems LLC*, ICFS File No. SAT-MOD-20260129-00065, Order, DA 26-553 ¶ 5 (SB rel. June 5, 2026) ("*Amazon Milestone Order*").

[14] *Amazon Milestone Order* ¶ 7.

nearly all of its authorized spectrum, and only one more satellite is necessary to fully satisfy the requirement.

Table 1: SES Milestone Compliance

Frequency Band (GHz)	Milestone Requirement	No. Satellites Required	No. Operational Satellites
17.8-18.6	66(b)(1)	15	18
18.8-19.3	66(b)(1)	15	18
19.3-19.7	66(b)(2)	11	10
19.7-20.2	66(b)(3)	13	14
27.5-27.6	66(b)(2)	11	10
27.6-28.4	66(b)(1)	15	18
28.4-28.6	66(b)(2)	11	10
28.6-29.1	66(b)(1)	15	18
29.1-29.5	66(b)(2)	11	10
29.5-30.0	66(b)(3)	13	14

The one satellite required to meet the 50% milestone was originally planned to be launched in 2025, which would have allowed SES to meet the August 7, 2026, deadline pursuant to the already requested extension.[15] However, due to a technical issue discovered during ground testing, SES was forced to delay the launch of the satellite until the manufacturer was able to resolve the issue. Once the issue was resolved, SES added the delayed satellite to the manifest of an already-contracted launch scheduled for late September 2026. That satellite will be ready to commence operations around the end of April 2027 following approximately six months of orbit raising and then in-orbit testing.[16] SES therefore requests a limited milestone extension until May 15, 2027, for the 19.3-19.7 GHz, 27.5-27.6 GHz, 28.4-28.6 GHz, and 29.1-29.5 GHz bands. For the other

[15] *See* 2024 Modification Request.

[16] The September launch includes two other mPOWER satellites, both of which are also capable of operating on the frequency bands subject to this extension request and therefore provide redundancy should any post-launch technical failures occur.

frequency bands, SES has met the 50% milestone ahead of the August 7, 2026, date requested by SES in 2024, and no further extension is necessary.

B. Granting the Requested Extension Will Serve the Public Interest

Grant of the requested extension will serve the public interest by allowing SES to provide more robust service to its customers. In granting U.S. market access, the Commission determined that additional O3b satellites would enable SES to expand broadband Internet access to communities across the United States.[17] The same public interest benefits support SES's request for milestone relief. The added satellite capacity launched in late September would enhance SES's ability to provide fast, flexible, and affordable connectivity in locations where terrestrial infrastructure is limited, unavailable, or otherwise unable to meet demand. Those benefits are especially important for customers that rely on resilient satellite connectivity for mobility, maritime, transport, government, enterprise, and other latency-sensitive applications.

The requested extension also supports the Commission's broader objective of promoting competition and innovation in the satellite broadband marketplace.[18] SES has a proven record of providing high-quality, cost-effective satellite services and has continued to invest substantially in its O3b system.[19] The requested extension will allow SES to build on that record by improving service availability for U.S. customers and other users served by the O3b network.

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[17] *O3b Market Access Grant* ¶ 44.

[18] *See, e.g.*, *Amendment of Parts 2 and 25 of the Commission's Rules to Enable NGSO Fixed-Satellite Service (Space-to-Earth) Operations in the 17.3-17.8 GHz Band*, Report and Order, 39 FCC Rcd 11156 ¶ 10 (2024).

[19] *See, e.g.*, Application of Astra (GB) Limited, ICFS File No. SAT-APL-20260623-00250 (filed July 6, 2026).

C. The Requested Extension Does Not Undermine the Milestone Rule

The requested extension does not implicate any spectrum warehousing or orbital resource concerns because SES is already actively using its authorized spectrum and orbital resources. The Commission's milestone rules are intended to ensure that authorized systems proceed toward deployment and that spectrum is not held by entities unwilling or unable to implement their systems.[20] The Bureau has granted milestone relief where an operator has made concrete progress toward deployment, demonstrated that it remains able and willing to proceed, and shown that the requested relief will not implicate the spectrum warehousing concerns the milestone rules are designed to prevent.[21]

For example, the Bureau issued Space Norway an extension upon finding that Space Norway had made "substantial expenditures and concrete progress toward imminent completion of the entire ASBM system."[22] Likewise, the Bureau thrice granted Viasat's milestone extension requests for the Viasat-3 satellite, each time finding that Viasat's continued progress toward launching its satellite mitigated any spectrum warehousing concerns.[23] Finally, the Bureau approved Intelsat's milestone extension request for the INTELSAT 10-02 after finding that "[u]nder the circumstances presented, it would not be in the public interest to cancel the license of a company that has completed construction of approximately 85 percent of its satellite and

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[20] *See, e.g.*, *O3b Market Access Grant* at n.128 (citing *Amendment of the Commission's Space Station Licensing Rules and Policies*, First Report and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 10760 ¶ 173 (2003)); *Space Norway AS*, Order and Declaratory Ruling, 38 FCC Rcd 9244 ¶ 7 (SB 2023) ("*Space Norway Milestone Order*").

[21] *See, e.g.*, *Intelsat LLC*, Memorandum Opinion and Order, 19 FCC Rcd 5266 ¶ 8 (IB 2004) ("*Intelsat Milestone Order*"); *Space Norway Milestone Order* ¶ 7; *Viasat, Inc.*, Order and Declaratory Ruling, 37 FCC Rcd 13054 ¶ 7 (IB 2022) ("*Third Viasat Milestone Order*").

[22] *Space Norway Milestone Order* ¶ 7.

[23] *See Third Viasat Milestone Order* ¶¶ 6-7; *Viasat, Inc.*, Order, 36 FCC Rcd 18160 ¶¶ 5-6 (IB 2021); *Viasat, Inc.*, Order and Declaratory Ruling, 35 FCC Rcd 5416 ¶¶ 8-11 (IB & OET 2020).

provided a concrete plan for completing construction and launching a satellite within the next several months."[24]

Those same considerations support the relief requested here:

- SES needs to deploy only one more satellite to satisfy the interim milestone;
- The O3b system consists of 30 operational satellites today;[25]
- The satellite is constructed, paid for, and scheduled to launch in September; and
- SES requests only a reasonable extension long enough to cover the launch, orbit raising, testing, and commencement of operations.

Under these circumstances, grant of this Amendment will allow SES to realize the public interest benefits of its authorized system without undermining the milestone rule's purpose of ensuring timely deployment and preventing spectrum warehousing.

D. SES Will Maintain and Increase Its Surety Bond

Consistent with FCC precedent, SES commits to maintaining its existing surety bond and increasing the bond amount during the requested extension period should the Bureau apply such a condition on its approval of this request.[26] If the Bureau grants the requested milestone extension and SES meets the extended milestone, SES expects that its surety bond would not be forfeited. SES's extension request is distinguishable from the case of Amazon Leo as discussed in more detail below.

[24] *Intelsat Milestone Order* ¶ 8.

[25] This figure includes the 12 satellites authorized prior to 2018 that are not counted for purposes of meeting the milestone requirement. *See O3b Market Access Grant* ¶ 66, n.132.

[26] *See, e.g.*, *Space Norway Milestone Order* ¶ 8; *Third Viasat Milestone Order* ¶¶ 3, 9.

E. A Limited Extension of the Interim Milestone Deadline Is Appropriate Here

The Bureau recently declined to grant Amazon Leo's request to extend its interim milestone requirement.[27] SES's circumstances are distinguishable and support the opposite result.

Amazon Leo sought a two-year extension of its interim milestone deadline or, in the alternative, a waiver of the interim milestone requirement.[28] At the time, it estimated that it would launch 700 satellites, approximately 21% of its authorized system, by the original interim deadline.[29] Amazon Leo did not seek an extension of its final milestone, but instead committed to meeting the final deadline, which would occur only a year after the extended interim deadline. The Bureau found that "the benefits of targeting the final milestone deadline outweigh the costs and potential risks of extending the interim milestone deadline."[30] The Bureau also determined that the public interest would be better served by Amazon Leo focusing on meeting the final milestone and therefore waived the interim milestone requirement.[31]

SES's circumstances differ from Amazon Leo's for four reasons. *First*, SES now needs to launch only one satellite to meet its interim milestone requirement rather than hundreds. The risk of SES failing to meet the requirement is therefore far less than it was for Amazon Leo.

Second, SES's requested extension and Amazon Leo's waiver grant serve different purposes. SES is requesting a limited extension to launch a satellite that will enhance the existing services that it is already providing. By contrast, Amazon Leo is a new market entrant that has yet

[27] *Amazon Milestone Order* ¶ 19.

[28] *Id.* ¶ 8.

[29] *Id.*

[30] *Id.* ¶ 19.

[31] *Id.*

to launch its commercial service.[32] The Bureau expressly waived Amazon Leo's interim milestone, allowing Amazon Leo to focus on its final milestone deadline because promoting "a second large satellite broadband constellation" serves the public interest by increasing competition and consumer choice.[33]

Third, SES's extension request—and the regulatory status of its system—has been pending for over two years. In that time, SES has steadily deployed its system to further demonstrate that SES is actively using the spectrum, not warehousing it, consistent with the purpose of the milestone requirements. The Bureau granted Amazon Leo's application in six months, providing Amazon prompt regulatory certainty as it continues to build out its system.[34]

Fourth, SES's requested extension results in less paperwork for the Bureau than Amazon Leo's. The Bureau declined to extend Amazon Leo's interim milestone, in part, because the extended deadline would be one year before Amazon Leo's final deadline. The Bureau found "little purpose" in Amazon Leo submitting, and the Bureau reviewing, the interim milestone and final milestone certifications in back-to-back years.[35] As discussed below, the Bureau would need to review SES's milestone progress only once because SES plans to file both the interim and final notices concurrently. Thus, granting a waiver rather than an extension request here would create no additional "administrative efficiency."[36]

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[32] *See* Application of Amazon Leo, ICFS File No. SAT-MOD-20260129-00065, Narrative at 12 (filed Jan. 30, 2026); *Amazon Leo mission updates: 375+ satellites now in orbit after successful Atlas V launch*, Amazon News (July 2, 2026), https://www.aboutamazon.com/news/innovation-at-amazon/project-kuiper-satellite-rocket-launch-progress-updates (indicating that Amazon Leo expected to conduct an initial service rollout "later this year").

[33] *Amazon Milestone Order* ¶ 14.

[34] *Id.* ¶ 12.

[35] *Id.* ¶ 19.

[36] *Id.* ¶ 17.

In summary, a milestone extension is appropriate in this instance due to SES's progress in deploying its system, the limited nature of its request, the amount of time that has elapsed since SES submitted its initial request, and the absence of any material difference in administrative burden that the extension grant would impose on the Bureau.

III. SES PARTIALLY SURRENDERS ITS MARKET ACCESS AUTHORIZATION AND WITHDRAWS ITS REQUEST TO EXTEND THE FINAL MILESTONE DEADLINE

SES's market access grants for O3b authorize a constellation of 42 satellites in total, including the ten "O3bI" satellites.[37] Due to changed circumstances since 2018, SES has redesigned its constellation. SES no longer intends to launch the O3bI satellites and hereby surrenders its authorization for those satellites. SES instead plans to launch additional satellites at different inclinations, as described in its recent amendment application.[38] The removal of O3bI is a reduction in SES's constellation size and therefore will not worsen the interference environment for other same-round Ka-band applicants or licensees.[39]

Removing the O3bI satellites reduces SES's authorized constellation to 32 satellites. As discussed above, SES will satisfy the 50% milestone for the O3b system once it has brought one additional satellite into operation. With the surrender of authorization for the O3bI satellites, SES will *also* satisfy the 100% milestone because the September 2026 launch will add three satellites

[37] *See O3b Market Access Grant* ¶¶ 4-5, 45.

[38] *See* Application of Astra (GB) Limited, ICFS File No. SAT-APL-20260623-00250 (filed July 6, 2026).

[39] The removal should not affect SES's processing round status. *See, e.g.*, *Teledesic LLC*, Order and Authorization, 14 FCC Rcd 2261 ¶ 12 (IB 1999) (allowing Teledesic to modify its system, including a drastic reduction in constellation size, and remain in its processing round because the proposed modifications would not increase the interference potential); *Space Exploration Holdings*, Order and Authorization, 34 FCC Rcd 2526 ¶ 11 (2019) (allowing SpaceX to modify its system, including a small reduction in constellation size, and remain in its processing round because the proposed modification would not increase the interference potential).

for a total constellation of 33 satellites.[40] Accordingly, SES withdraws its milestone extension request for the final milestone.[41]

SES's decision not to deploy the O3bI satellites should not result in default on its surety bond.[42] The Commission's milestone rules require an NGSO authorization holder to launch and operate 50% of the maximum number of space stations authorized for service by the interim milestone.[43] An operator that satisfies the interim milestone is relieved of its bond obligation.[44] For an operator that meets the interim milestone but fails to satisfy the final milestone, its authorization is reduced and capped at the number of authorized satellites operating on the date of the final milestone.[45]

As explained in this Amendment and SES's previous extension request, good cause exists to extend the interim milestone requirement.[46] An extension would allow SES to meet the interim milestone requirement for the full 42-satellite system by May 15, 2027.[47] Satisfaction of that interim requirement would subsequently relieve SES of the surety bond. The original final milestone deadline would occur less than a month later, on June 7, 2027. Because SES would not

[40] No more than 32 satellites will provide service to the United States at any one time consistent with SES's U.S. market access authority.

[41] The original 100% milestone deadline was June 7, 2027. Because SES's requested interim milestone extension deadline occurs only a few weeks earlier, the Bureau can process both the interim and final milestone notifications at the same time.

[42] *See* 47 C.F.R. § 25.165(c) ("A licensee will be considered to be in default with respect to a bond filed pursuant to paragraph (a) of this section if it surrenders the license before meeting an applicable milestone requirement in [47 C.F.R. § 25.164(b)(1)] or if it fails to satisfy any such milestone").

[43] 47 C.F.R. § 25.164(b)(1).

[44] 47 C.F.R. § 25.165(d).

[45] *See Amazon Milestone Order* ¶ 4.

[46] *See* 2024 Modification Request.

[47] The *O3b Market Access Grant* milestones were calculated based on a 42-satellite system. If recalculated for a 32-satellite system, SES has already satisfied the interim milestone requirement.

meet that deadline for the full 42-satellite system, its authorization would be reduced and capped at the 32 authorized satellites launched and operating on that date anyway. SES's surrender of authority for the 10 "O3bI" inclined satellites should therefore be treated as a permissible reduction in the authorized system rather than a milestone failure or a basis for bond default.

IV. CONCLUSION

For the reasons set forth above, SES respectfully requests that the Bureau grant this Amendment and extend the 50% deployment milestone to May 15, 2027, for the 19.3-19.7 GHz, 27.5-27.6 GHz, 28.4-28.6 GHz, and 29.1-29.5 GHz bands. For all other frequency bands, SES maintains its 2024 request for an extension of the interim milestone to August 7, 2026.

Respectfully submitted,

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