

File # SAT-LOA-20130626-00087

Call Sign S2912 Grant Date 12/03/13

(or other identifier) Term Dates See conditions

From Conditions To: conditions

Approved: *Stephan J. Duall*

*Stephan J. Duall*  
Chief, Satellite Policy Branch

Approved by OMB  
3060-0678



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File Number: SAT-LOA-20130626-00087  
Callsign/Satellite ID: S2912

APPLICATION FOR SATELLITE SPACE STATION AUTHORIZATIONS  
FCC 312 MAIN FORM  
FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
Flock 1

1-8. Legal Name of Applicant		Phone Number:	415-317-6404
Name:	Planet Labs Inc.	Fax Number:	415-829-3392
DBA Name:		E-Mail:	mike@planet-labs.com
Street:	490 2nd Street Suite 101	State:	CA
City:	San Francisco	Zipcode:	94107
Country:	USA		
Attention:	Mr Michael Safyan		

**Attachment to Grant**  
**IBFS File No. SAT-LOA-20130626-00087**  
**Call Sign S2912**

The application of Planet Labs Inc., IBFS File No. SAT-LOA-20130626-00087, for authority to launch and operate non-geostationary-orbit remote-sensing space stations IS GRANTED. Specifically, Planet Labs is authorized to launch and operate 28 non-geostationary-orbit space stations that will transmit remote-sensing and telemetry data to fixed earth stations in the 8025-8400 MHz frequency band from circular orbits with altitudes between 410 and 200 kilometers and receive command signals in the 2025-2110 MHz band. Planet Labs is also authorized to use the 401-402 MHz and 449.75-450.25 MHz bands for early-phase and emergency-backup telemetry, tracking, and command operation. Operation under this authorization must be in accordance with the technical specifications in the above-referenced application and the Federal Communications Commission's rules except as waived herein, and is subject to the following conditions:

1. Planet Labs must prepare the necessary information, as may be required, for submission to the International Telecommunication Union (ITU) to initiate and complete the advance publication, international coordination, due diligence, and notification process for these space stations, in accordance with the ITU Radio Regulations. Planet Labs shall be held responsible for all cost-recovery fees associated with ITU filings. No protection from interference caused by radio stations authorized by other administrations is guaranteed unless coordination and notification procedures are timely completed or, with respect to individual administrations, by successfully completing coordination agreements. Any radio station authorization for which coordination has not been completed may be subject to additional terms and conditions as required to effect coordination of the frequency assignments of other administrations. See 47 C.F.R. § 25.111(b).
2. Power flux-density from operation in the 8025-8400 MHz band must not exceed the limits in No. 22.5 or Table 21-4 of the International Telecommunication Union's Radio Regulations or the limits in ITU-R Recommendation SA-1157. 3.
3. Operations pursuant to this authorization must not cause harmful interference to stations operating in the 2025-2110 MHz band in accordance with the U.S. Table of Frequency Allocations. See 47 C.F.R. § 2.106, Footnote US347.
4. Given the opportunity for additional entrants to operate in the 8025-8400 MHz band, we grant Planet Lab's request for waiver of the modified processing round requirements of 47 C.F.R. §§ 25.156 and 25.157. See *DigitalGlobe, Inc.*, Order and Authorization, 20 FCC Rcd 15696 (Sat. Div., Int'l Bur. 2005), at Paragraph 8.
5. Because Planet Labs must comply with technical requirements in Part 2 of the Commission's rules and the above-referenced power flux-density limits, which should prevent harmful interference to other operators in the band, we grant its request for a waiver of the default service rules in 47 C.F.R. § 25.217(b). See *DigitalGlobe, Inc.*, *supra*, at Paragraph 15.
6. Unless extended by the Commission for good cause shown, this authorization shall become null and void in the event the authorized space stations are not constructed and

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launched in accordance with this application pursuant to the schedule in Section 25.164(b) of the Commission's rules.

- a. Enter into a binding non-contingent satellite construction contract by December 3, 2014.
  - b. Complete Critical Design Review by December 3, 2015.
  - c. Begin construction of the first satellite by June 3, 2016.
  - d. Launch and operate the first satellite by June 5, 2017.
  - e. Bring all of the authorized satellites into operation by December 3, 2019.
7. Planet Labs must file a bond with the Commission in the amount of \$5,000,000 pursuant to 47 C.F.R. § 25.165 and the procedures set forth in Public Notice, DA 03-2602, 18 FCC Rcd 16283 (2003), within 30 days of the date of this grant, *i.e.*, by January 2, 2014.
  8. Within 30 days after the launch of each satellite pursuant to this authorization, Planet Labs must file a notification with the Commission specifying its apogee and perigee altitudes and orbital inclination.
  9. The license term for the constellation is 15 years and will begin on 3 a.m. EST on the date that Planet Labs certifies to the Commission that its initial space station has been successfully placed into orbit and its operations fully conform to the terms and conditions of this authorization. Planet Labs must file such certification within five business days of placing its initial satellite into operation.
  10. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106 and 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.



\*with conditions

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From see conditions Term Dates see conditions  
To: conditions

Approved: Stephen J. Duall  
Stephen J. Duall  
Chief, Satellite Policy Branch

9-16. Name of Contact Representative

Name:	Michael Safyan	Phone Number:	415-317-6404
Company:	Planet Labs Inc.	Fax Number:	415-829-3392
Street:	490 2nd Street Suite 101	E-Mail:	mike@planet-labs.com
City:	San Francisco	State:	CA
Country:	USA	Zipcode:	94107 --
Attention:		Relationship:	Engineer

**CLASSIFICATION OF FILING**

17. Choose the buttonnext to the classification that applies to thisfiling for both questions a. and b. Choose only one for 17a and only one for 17b.

- a.
- (N/A) a1. Earth Station
  - a2. Space Station

b.

- b1. Application for License of New Station (N/A)
- b2. Application for Registration of New Domestic Receive-Only Station (N/A)
- b3. Amendment to a Pending Application (N/A)
- b4. Modification of License or Registration (N/A)
- b5. Assignment of License or Registration (N/A)
- b6. Transfer of Control of License or Registration (N/A)
- b7. Notification of Minor Modification (N/A)
- b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite
- b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States
- b10. Replacement Satellite Application - no new frequency bands
- b11. Replacement Satellite Application - new frequency bands (Not eligible for streamlined processing)
- b12. Petition for Declaratory Ruling to be Added to the Permitted List (N/A)
- b13. Other (Please specify)

<p>17c. Is a fee submitted with this application?</p> <p><input checked="" type="radio"/> If Yes, complete and attach FCC Form 159.</p> <p>If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).</p> <p><input type="radio"/> Governmental Entity    <input type="radio"/> Noncommercial educational licensee</p> <p><input type="radio"/> Other (please explain):</p>	<p>17c. Fee Classification    CLW – Space Station (Non-Geostationary)</p>
<p>18. If this filing is in reference to an existing station, enter:</p> <p>(a) Call sign of station: Not Applicable</p>	
<p>19. If this filing is an amendment to a pending application enter:</p> <p>(a) Date pending application was filed: Not Applicable</p>	<p>(b) File number of pending application: Not Applicable</p>

**TYPE OF SERVICE**

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:

- a. Fixed Satellite
- b. Mobile Satellite
- c. Radiodetermination Satellite
- d. Earth Exploration Satellite
- e. Direct to Home Fixed Satellite
- f. Digital Audio Radio Service
- g. Other (please specify)

21. STATUS: Choose the button next to the applicable status. Choose only one.

- Common Carrier
- Non-Common Carrier

22. If earth station applicant, check all that apply.  
Not Applicable

23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:

- Connected to a Public Switched Network
- Not connected to a Public Switched Network
- N/A

24. FREQUENCY BAND(S): Place an "X" in the box(es) next to all applicable frequency band(s).

- a. C-Band (4/6 GHz)
- b. Ku-Band (12/14 GHz)
- c. Other (Please specify upper and lower frequencies in MHz.)  
Frequency Lower: 401      Frequency Upper: 8400  
(Please specify additional frequencies in an attachment)

**TYPE OF STATION**

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- (N/A) a. Fixed Earth Station
- (N/A) b. Temporary-Fixed Earth Station
- (N/A) c. 12/14 GHz VSAT Network
- (N/A) d. Mobile Earth Station
- e. Geostationary Space Station.
- f. Non-Geostationary Space Station
- g. Other (please specify)

26. TYPE OF EARTH STATION      FACILITY: Not Applicable

**PURPOSE OF MODIFICATION**

27. The purpose of this proposed modification is to: (Place an "X" in the box(es) next to all that apply.)      Not Applicable

**ENVIRONMENTAL POLICY**

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. §§ 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.

Yes       No

**ALIEN OWNERSHIP**

Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30-34.

<p>29. Is the applicant a foreign government or the representative of any foreign government?</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>
<p>30. Is the applicant an alien or the representative of an alien?</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A</p>
<p>31. Is the applicant a corporation organized under the laws of any foreign government?</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A</p>
<p>32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A</p>
<p>33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A</p>
<p>34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.</p>	

**BASIC QUALIFICATIONS**



<p>35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules? If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.</p>	<p><input checked="" type="radio"/> Yes    <input type="radio"/> No</p>
<p>36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.</p>	<p><input type="radio"/> Yes    <input checked="" type="radio"/> No</p>
<p>37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances.</p>	<p><input type="radio"/> Yes    <input checked="" type="radio"/> No</p>
<p>38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances</p>	<p><input type="radio"/> Yes    <input checked="" type="radio"/> No</p>
<p>39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.</p>	<p><input type="radio"/> Yes    <input checked="" type="radio"/> No</p>

<p>40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.</p>	<p>Exhibit 40</p>
<p>41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; party to the application; for these purposes.</p>	<p>Yes <input checked="" type="radio"/> No <input type="radio"/></p>
<p>42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.</p>	<p>Yes <input type="radio"/> No <input checked="" type="radio"/></p>
<p>42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?</p>	

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

See Exhibit 43

Exhibit 43

43a. Geographic Service Rule Certification

By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.

A

By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.

B

By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached.

C

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)	
<input type="radio"/> Individual <input type="radio"/> Unincorporated Association <input type="radio"/> Partnership <input checked="" type="radio"/> Corporation <input type="radio"/> Governmental Entity <input type="radio"/> Other (please specify)	
45. Name of Person Signing Michael Safyan	46. Title of Person Signing Regulatory Compliance
47. Please supply any need attachments.	
1: ODAR	2:
	3:
<p style="text-align: center;">WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT  (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION  (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).</p>	

Completed Schedule S

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