



File # SAT-LOA-20200907-00105

Call Sign S3072 Grant Date May 24, 2021
(or other identifier)

Approved by OMB
3060-0678

Term Dates

From See conditions To: See conditions

Date & Time Filed: Sep 7 2020 4:33:31:323PM
File Number: SAT-LOA-20200907-00105
Callsign/Satellite ID: S3072

GRANTED *
International Bureau
*with conditions

Approved: Merissa L. Velez
Merissa L. Velez
Chief, Satellite Policy Branch

APPLICATION FOR SATELLITE SPACE STATION AUTHORIZATIONS FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	FCC Use Only
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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
YAM-3 – Part 25 Space Station License Application

1-8. Legal Name of Applicant			
Name:	Loft Orbital Solutions Inc.	Phone Number:	410-382-5050
DBA Name:		Fax Number:	
Street:	715 Bryant Street Suite 202	E-Mail:	
City:	San Francisco	State:	CA
Country:	USA	Zipcode:	94107 -
Attention:	Alex Greenberg		

ATTACHMENT TO GRANT

Loft Orbital Solutions Inc.
IBFS File No. SAT-LOA-20200907-00105

IBFS File No(s):	SAT-LOA-20200907-00105 ¹	<p>GRANTED -- With Conditions</p>  <p>International Bureau Satellite Division</p>
Licensee/Grantee:	Loft Orbital Solutions, Inc.	
Call Sign:	S3072	
Satellite Name:	YAM-3	
Orbital Location: (required station-keeping tolerance)	Non-geostationary satellite orbit (NGSO), initial deployment to approximately 525 km (between 500 km and 535 km) altitude, 97.6 degrees inclination.	
Administration:	United States of America	
Nature of Service:	Earth Exploration Satellite Service (EESS); Standard Frequency and Time Signal-Satellite Service; Fixed-Satellite and Mobile-Satellite Services	
Scope of Grant:	Authority to construct, deploy and operate a single non-geostationary-satellite orbit (NGSO) satellite	
Service Area(s):	Global, subject to limitations in specific frequency bands	
Frequencies:	<p>8025-8400 MHz (space-to-Earth) Standard Frequency and Time Signal (space-to-Earth): 400.075-400.125 MHz Fixed-Satellite and Mobile-Satellite Services (Earth-to-space) (receiving from U.S. earth stations): 902-906 MHz Fixed-Satellite and Mobile-Satellite Services (Earth-to-space) (receiving from non-U.S. earth stations): 865-866.4 MHz, 868-869.7 MHz, 902-906 MHz, and 920-924 MHz Fixed-Satellite Service (space-to-Earth and Earth-to-space): 2400-2483.5 MHz Inter-satellite link transmit (to the Globalstar system): 1615.035-1617.495 MHz Inter-satellite link receive (from the Globalstar system): 2488.695-2491.155 MHz Inter-satellite link receive (from the Inmarsat system): 1535-1559 MHz</p> <p>Telemetry, Tracking and Command frequencies (non-U.S. earth stations only):8025–8400 MHz (space-to-Earth) 400.15-401 MHz and 401-402 MHz (space-to-Earth) (backup only) 2025-2110 MHz (Earth-to-space) 449.75 - 450.25 MHz (Earth-to-space) (backup only))</p>	
<p>Operations under this grant must comport with the legal and technical specifications 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:</p> <ol style="list-style-type: none"> Loft must timely provide the Commission with the information required for Advance Publication, Coordination, and Notification of the frequency assignment(s) for this constellation, including due diligence information, pursuant to Articles 9 and 11 of the ITU Radio Regulations. This authorization may be modified, without prior notice, consistent with the coordination of the frequency assignment(s) with other Administrations. See 47 CFR § 25.111(b). Loft is responsible for all cost-recovery fees associated with the ITU filings. 47 CFR § 25.111(d). The U.S. Administration will not object to use of the YAM-3 space station by the Administration of France for bringing into use or continuing use of assignments in the 400.05-400.15 MHz frequency band contained in the filing F-SAT-NG-8. 		

¹ This application was placed on public notice on January 29, 2021. *Satellite Policy Branch Information, Space Station Applications Accepted for Filing*, Report No. SAT-01525 (Jan. 29, 2021). No comments were filed.

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3. Loft's request for its application to be processed under the rules adopted for streamlining licensing of small satellites, adopted in FCC 19-81,² is granted. The operations requested in this application meet the criteria for streamlined small satellite applicants.³ We conclude that the YAM-3 operations are compatible with existing operations in the requested frequency bands and will not materially constrain future space station entrants from using the requested frequency bands.⁴
4. In order to protect NOAA radiosondes operations in the United States, operations in the 400.15-401 MHz (space-to-Earth) frequency band are limited to Loft Orbital YAM-3 satellite system transmissions and shall not exceed the long term interference criteria limits specified in Table 2 (Type C) of Recommendation ITU-R RS.1263-2.
5. Downlink transmissions from Loft YAM-3 in the 400.15-401 MHz and 401-402 MHz (space-to-Earth) frequency bands, when in view of those earth station(s) receiving from YAM-3, must not exceed a duty cycle of 50%.
6. For operations with U.S. earth stations in the 902-906 MHz frequency band, this grant is limited to reception of authorized signals from earth stations operating in accordance with an appropriate license issued under the Commission's Part 5 experimental licensing rules. Loft's request for a waiver of the U.S. Table of Frequency Allocations, 47 CFR § 2.106, to receive transmissions from such radios is granted on an unprotected, non-harmful interference basis. The relevant frequency band is not allocated for satellite service and is used by radios that operate under Part 15 of the Commission's rules. Part 15 does not specifically authorize transmissions intended for operations in a space service, or for transmission to receivers in space. This grant should not be construed as in any way authorizing transmissions from Part 15 devices that are triggered by or specifically intended for reception by the YAM-3 satellite. Any determination as to whether such transmissions are within the scope of permitted Part 15 transmissions will be made separately.

² *Streamlining Licensing Procedures for Small Satellites*, Report and Order, FCC 19-81, 34 FCC Rcd 13077 (2019) (*Small Satellite Report and Order*).

³ See 47 CFR § 25.122; see also Loft Orbital Solutions, Inc., Legal Narrative at 6-9 (addressing compliance with the qualifying criteria in 47 CFR § 25.122(c)).

⁴ See 47 CFR § 25.122 (c)(9), (d)(3). We note that although operations of the Standard Frequency and Time Signal in the 400.075-400.125 MHz (space-to-Earth) frequency band are intended for downlink beacon transmissions, such operations are limited to a two satellites, the YAM-3, and the previously granted YAM-2 satellite, and will only be transmitted to any particular location on Earth during the time when one of those satellites is passing overhead. Furthermore, Loft Orbital states that it currently has no plans, as part of its standard rideshare missions, to submit additional FCC satellite applications involving proof-of-concept demonstration and test payloads that use these UHF frequencies and are associated with the French administration International Telecommunication Union filing F-SAT-NG-8. See Letter from Alexander B. Greenberg, COO & Co-founder, Loft Orbital, to Marlene H. Dortch, Secretary, FCC, dated April 29, 2021. Reception by YAM-3 from any "short-range devices" in the 865-866.4 MHz, 868-869.7 MHz, 902-906 MHz, and 920-924 MHz (Earth-to-space) frequency bands will take place only when that single satellite is in view of those "devices" (i.e., earth stations). In addition, reception of signals from U.S. earth stations in the 902-906 MHz (Earth-to-space) frequency band is on a non-interference basis and is limited to reception from radios subject to the limitations in part 15 of the Commission's rules. Operations in the 8025-8400 MHz (space-to-Earth) and 2025-2110 MHz (Earth-to-space) frequency bands will be limited to those times when the YAM-3 satellite is in view of specified earth stations coordinated with federal operators, of which three have been specified at the time of grant. See Appendix A; see also Letter from Alexander B. Greenberg, COO & Co-founder, Loft Orbital, to Marlene H. Dortch, Secretary, FCC, dated May 5, 2021 (Loft May 5 Letter). Reception from the Inmarsat system in the 1535-1559 MHz (space-to-space) frequency band and reception of the GPS L1 signal (center frequency of 1575.42 MHz) are with pre-existing signals that have not been altered to provide service to YAM-3. Operations with the Globalstar system in the 2488.695-2491.155 MHz (space-to-space) and 1615.035-1617.495 MHz (space-to-space) frequency bands are for extremely limited data transmissions, and any downlinks from the Globalstar system resulting from these operations will be indistinguishable from expected transmissions to terrestrial receivers.

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7. For operations in the 865-866.4 MHz, 868-869.7 MHz, 902-906 MHz, and 920-924 MHz frequency bands with stations outside the United States, this grant is limited to reception of signals from earth stations operating in accordance with the national regulations of the Administration to which such earth station is subject, including any determination by such Administration as to whether the scope of any authorization of short range devices includes communication with the YAM-3 satellite. Upon request from any Administration, Loft must cease any YAM-3 operations that facilitate unauthorized operations by earth stations subject to authorization by that Administration.
8. Reception in the 865-866.4 MHz, 868-869.7 MHz, 902-906 MHz, and 920-924 MHz frequency bands must comport with the requirements on unauthorized publication or use of communications in section 705 of the Communications Act of 1934, as amended (47 U.S.C. § 605). This grant does not "authorize" the licensee with respect to the practices prohibited in section 705 of the Communications Act or in related provisions of chapter 119, Title 18, United States Code.
9. Loft's request for a waiver of the U.S. Table of Frequency Allocations, 47 CFR § 2.106, to receive satellite navigation correction data signals from Inmarsat satellites in the 1535-1559 MHz band is granted, on an unprotected basis. Although these frequencies do not include a directional indicator for space-to-space communications, reception by YAM-3 of an existing Inmarsat signal that is primarily provided to earth stations will not in any way alter the interference environment. Use of the signal will improve the accuracy of Loft's location assessment and facilitate improvements in tracking YAM-3, imagery analysis, and geolocation applications.⁵
10. Loft's request for a waiver of the U.S. Table of Frequency Allocations, 47 CFR § 2.106, to utilize inter-satellite links with the Globalstar satellite system in 1615.035-1617.495 MHz and 2488.695-2491.155 MHz is granted on an unprotected, non-interference basis. The allocation for the Mobile-Satellite Service in which the Globalstar system operates and that encompasses these bands does not include a space-to-space directional indicator. The signals received from the Globalstar system will be indistinguishable in radio-frequency characteristics from routine Globalstar operations with earth stations. The signals transmitted from YAM-3 are within the frequency range that does not overlap with any other authorized system, and will be used on a limited basis for data requiring transmission prior to available downlink opportunities directly to earth stations.
11. Loft's request for a waiver of the U.S. Table of Frequency Allocations, 47 CFR § 2.106, to transmit (space-to-Earth) signals in 2400-2483.5 MHz band, limited to one hour per day or less, is granted. Transmissions are limited to the San Diego, California earth station, as specified in the license granted to Totum Labs, Inc, Experimental Licensing System File No. 0391-EX-CN-2020. Transmission of these signals is on an unprotected, non-harmful interference basis. Loft states that transmissions in this band would be 10 dB below the noise floor and affect only 1 of 79 Bluetooth channels.
12. Loft's request for a waiver of the U.S. Table of Frequency Allocations, 47 CFR § 2.106, to receive (Earth-to-space) signals in 2400-2483.5 MHz band, limited to one hour per day or less, is granted. Such reception is limited to signals from the San Diego, California earth station, as specified in the license granted to Totum Labs, Inc, Experimental Licensing System File No. 0391-EX-CN-2020. Reception of these signals is on an unprotected, non-harmful interference basis. Loft states that transmissions in this band would be 10 dB below the noise floor and affect only 1 of 79 Bluetooth channels.
13. Loft requests waivers, to the extent necessary, of the U.S. Table of Frequency Allocations, 47 CFR § 2.106, to conduct data downlink operations in the 8025-8400 MHz (space-to-Earth) frequency band and to conduct TT&C uplink operations in the 2025-2110 MHz (Earth-to-space) frequency band. Both of these bands are allocated for EESS systems. 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

⁵ See Loft Orbital Solutions, Inc., Legal Narrative at 4, 17.

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Allocations. *See* 47 CFR § 2.106, footnote US347. At least 95 percent of data transmissions transmitted by YAM-3 must be for data derived from the imager and camera onboard YAM-3,⁶ and up to 5 percent will be from data received from terrestrial transmitters, and some but not all of that 5 percent will be from sensors that measure temperature, rainfall, wind, soil conditions, etc. We grant the requested waiver to permit the ancillary transmission of non-EESS data.

14. Communications in the 2025-2110 and 8025-8400 MHz frequency bands may only be with earth stations coordinated with the National Aeronautics and Space Administration (NASA), the Air Force Spectrum Management Office (AFSMO), and the DOC/NOAA. A list of the coordinated earth stations as of the date of grant is attached as Appendix A to this grant. Loft shall provide the FCC with an updated list of coordinated earth stations within ten business days following any changes to the list.
15. Transmissions in the 8025-8400 MHz frequency band to the Svalbard, Norway earth station must cease when the YAM-3 satellite comes within a 3-degree conjunction angle of the NOAA Suomi-NPP satellite when the Suomi-NPP satellite is transmitting to its associated earth station in Svalbard, Norway. The conjunction angle is measured from the boresight of the NOAA earth station antenna.
16. Loft must coordinate physical operations of spacecraft with any operator using similar orbits, for the purpose of eliminating collision risk and minimizing operational impacts. The orbital parameters specified in this grant are subject to change based on such coordination.
17. Upon receipt of a conjunction warning from the 18th Space Control Squadron or other source, Loft must review and take all possible steps to assess the collision risk, and mitigate collision risk if necessary. As appropriate, steps to assess and mitigate should include, but are not limited to: contacting the operator of any active spacecraft involved in such warning; sharing ephemeris data and other appropriate operational information with any such operator; and modifying spacecraft attitude and/or operations.
18. Unless extended by the Commission for good cause shown, this authorization will become null and void in the event the YAM-3 space station is not constructed and launched in accordance with the schedule set forth in section 25.164 of the Commission's rules.
 - a. In the event that the YAM-3 space station has not been launched, placed into the assigned orbit, and begun operations in accordance with this grant by **May 24, 2022**,⁷ Loft must post a surety bond in satisfaction of 47 CFR §§ 25.165(a)(1) & (b) no later than **June 23, 2022**, and thereafter maintain on file a surety bond requiring payment in the event of a default in an amount, at minimum, determined according to the formula set forth in 47 CFR § 25.165(a)(1); and
 - b. Loft must launch the YAM-3 space station, place it into the assigned orbit, and operate the space station in accordance with this grant no later than **May 24, 2027**. 47 CFR § 25.164(b).
19. The license term is six years and will begin on 3 a.m. EST on the date that Loft certifies to the Commission that its YAM-3 space station has been successfully placed into orbit and its operations fully conform to the terms and conditions of this authorization. Loft must file such certification within five business days of placing YAM-3 into operation.

⁶ *See* Loft Orbital Solutions, Inc., Legal Narrative at 10. The National Oceanic and Atmospheric Administration has issued a license for the operation of YAM-3's satellite imaging sensors. *See* Loft May 5 Letter.

⁷ We note that since this application is being processed under the rules adopted for streamlined licensing of small satellites adopted in FCC 19-81, which are now effective, the requirement for Loft to post a surety bond in accordance with 47 CFR § 25.165(a)(1) & (b) is deferred by one year following the date of grant in accordance with the grace period adopted in FCC 19-81. *See* 47 CFR 25.165(a); *Small Satellite Report and Order*, 34 FCC Rcd at 13112-13, paras. 93-97.

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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:	May 24, 2021	
Term Dates	From: see conditions	To: see conditions

Approved:

Merissa L. Velez

Merissa L. Velez
Chief, Satellite Policy Branch

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Appendix A

1. Location: Svalbard, Norway; Operated by Kongsberg Satellite Services
2. Location: Troll, Antarctica; Operated by Kongsberg Satellite Services
3. Location: Tromsø, Norway; Operated by Kongsberg Satellite Services

9–16. Name of Contact Representative

Name:	Tony Lin	Phone Number:	202–637–5795
Company:	Hogan Lovells US LLP	Fax Number:	
Street:	555 13th Street, NW	E–Mail:	tony.lin@hoganlovells.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20004 –
Attention:		Relationship:	Legal Counsel

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)

17c. Is a fee submitted with this application?

If Yes, complete and attach FCC Form 159.

If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).

Governmental Entity Noncommercial educational licensee

Other (please explain): Small Satellite System

17c. Fee Classification

18. If this filing is in reference to an existing station, enter:

(a) Call sign of station:
Not Applicable

19. If this filing is an amendment to a pending application enter:

(a) Date pending application was filed:

Not Applicable

(b) File number of pending application:

Not Applicable

TYPE OF SERVICE

<p>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:</p> <p><input type="checkbox"/> a. Fixed Satellite</p> <p><input type="checkbox"/> b. Mobile Satellite</p> <p><input type="checkbox"/> c. Radiodetermination Satellite</p> <p><input checked="" type="checkbox"/> d. Earth Exploration Satellite</p> <p><input type="checkbox"/> e. Direct to Home Fixed Satellite</p> <p><input type="checkbox"/> f. Digital Audio Radio Service</p> <p><input checked="" type="checkbox"/> g. Other (please specify) See Narrative.</p>	
<p>21. STATUS: Choose the button next to the applicable status. Choose only one.</p> <p><input type="radio"/> Common Carrier <input checked="" type="radio"/> Non-Common Carrier</p>	<p>22. If earth station applicant, check all that apply.</p> <p>Not Applicable</p>
<p>23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:</p> <p><input type="radio"/> Connected to a Public Switched Network <input type="radio"/> Not connected to a Public Switched Network <input checked="" type="radio"/> N/A</p>	
<p>24. FREQUENCY BAND(S): Place an "X" in the box(es) next to all applicable frequency band(s).</p> <p><input type="checkbox"/> a. C-Band (4/6 GHz) <input type="checkbox"/> b. Ku-Band (12/14 GHz)</p> <p><input checked="" type="checkbox"/> c. Other (Please specify upper and lower frequencies in MHz.)</p> <p>Frequency Lower: 400.05 Frequency Upper: 8400 (Please specify additional frequencies in an attachment)</p>	

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.

29. Is the applicant a foreign government or the representative of any foreign government?

Yes No

30. Is the applicant an alien or the representative of an alien?

Yes No N/A

31. Is the applicant a corporation organized under the laws of any foreign government?

Yes No N/A

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?

Yes No N/A

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?

Yes No N/A

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.

BASIC QUALIFICATIONS

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.

Yes No

Ex. B – Tech Annex

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.

Yes No

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.

Yes No

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

Yes No

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.

Yes No

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.

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"; for these purposes. Yes No

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. Yes No

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? N/A

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.)

Applicant requests authority to deploy a single, non-geostationary orbit satellite, YAM-3, under the FCC's new streamlined small satellite rules to provide imaging and other satellite services.

Ex. D – ITU Letter

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.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing
Alex Greenberg

46. Title of Person Signing
Chief Operating Officer

47. Please supply any need attachments.

1: Ex. A – Narrative

2:

3:

**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).**

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