Before the Federal Communications Commission Washington, DC 20554

Application of

Capella Space Corp.

For Authority to Launch and Operate a Non-Geostationary Orbit Satellite System in the Earth Exploration Satellite Service Call Sign: S3073

File No. SAT-LOA-20200914-00108

Supplement

On September 14, 2020, Capella filed a request for authority to launch and operate three small satellites in low-Earth, non-geostationary orbit ("NGSO") to provide Earth-Exploration Satellite Service ("EESS"). That application included requests for the Commission to waive certain provisions of its rules and noted certain limitations on Capella's ability to perform a debris assessment using the most recent version of the NASA Debris Assessment Software ("DAS"). Capella hereby supplements its prior submission to request a single additional waiver, to the extent necessary, and to provide an updated debris assessment which confirms the results of the assessment previously submitted.

¹ See Application of Capella Space Corp. for Authority to Launch and Operate a Non-Geostationary Orbit Satellite System in the Earth Exploration Satellite Service, File No. SAT-LOA-20200914-00108 (filed Sep. 14, 2020) ("Capella Application").

² See, Waiver Requests attached to Capella Application ("Sep. 14 Waiver Request").

³ Capella Application at 7, note 5.

I. Waiver of U.S. Table of Frequency Allocations and Section 25.202(g)(1) for TT&C Operations in the 2025-2110 MHz band

As discussed in its Sep. 14 Waiver Request, Capella proposes to conduct its TT&C uplink transmissions at 2035-2037 MHz — spectrum in which non-federal Earth-to-space transmissions may be authorized for EESS operations subject to conditions on a case-by-case basis and on a non-harmful interference basis.⁴ As Capella explained, waiver of 25.202(g)(1) is appropriate because, while the rule anticipates that operators will conduct TT&C operations at the edges of their assigned service-link bands, Capella's system has no uplink service bands but nonetheless requires TT&C uplink communications.

For similar reasons, to the extent necessary, Capella hereby requests a waiver of the U.S. Table of Allocations. If the Capella system made use of uplink transmissions for its EESS operations, those operations would be consistent with the EESS (Earth-to-space) allocation in the 2025-2110 MHz band, subject to the conditions outlined above. Under those circumstances, Capella's TT&C operations could have occurred within that service band, consistent with Section 25.202(g)(1) and consistent with the U.S. Table of Allocations.

However, because Capella's uplink operations are TT&C only, whether these operations are consistent with the EESS (Earth-to-space) allocation may be unclear. Thus, Capella hereby requests a waiver of the U.S. Table of Allocations to the extent necessary to authorize TT&C-only operations in support of Capella's EESS system within the 2035-2037 MHz portion of the 2025-2110 MHz band. These TT&C-only operations plainly have less potential to cause interference than they would if they were combined with service uplink traffic. In addition, Capella acknowledges that such operations are subject to such conditions as the FCC may apply

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⁴ See id. § 2.106, n. US347.

on a case-by-case basis and may not cause harmful interference to Federal and non-Federal stations operating in accordance with the Table of Frequency Allocations.

II. Updated debris assessment

As Capella explained in its initial application, it had been unable to obtain the most recent version of DAS, version 3.1, from NASA. Capella certified that the human casualty risk calculated under the most recent DAS version to which it had access was zero ⁵ and that it would supplement the record with an updated debris assessment when it was able to access the latest version of the DAS software. Capella now provides that updated showing in the enclosed updated Orbital Debris Assessment Report, generated using DAS v. 3.1, the most recent version of that software. The human casualty risk calculated using that version of the DAS software continues to be zero.

Respectfully submitted,

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October 8, 2020

⁵ The exact value emitted by DAS was1:100000000. *See* Technical Attachment at 26 *attached to* Capella Application. DAS is not capable of producing a value of exactly zero under any circumstances, with the minimum value of 1:100000000 serving as its functional equivalent.

ENGINEERING CERTIFICATION

I hereby certify that I am the technically qualified person responsible for preparation of the engineering information contained in this submission. I have reviewed the engineering information submitted herein and certify that it is accurate to the best of my knowledge and belief.

/s/ Duncan Eddy

Duncan Eddy Director, Space Operations CAPELLA SPACE CORP.

October 8, 2020

Date

Capella (Sequoia - Whitney 1&2) Orbital Debris Assessment Report (ODAR)

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This report is presented in compliance with NASA-STD-8719.14, APPENDIX A.

Report Version: 3, 10/07/2020

Document Data is Not Restricted.

This document contains no proprietary, ITAR, or export controlled information.

DAS Software Version Used In Analysis: v3.1



VERSION APPROVAL and/or FINAL APPROVAL:

Duncan Eddy, Space Operations

PREPARED BY:

Lucas Riggi, Mission Design



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Self-assessment of the ODAR

This ODAR follows the format recommended in NASA-STD-8719.14, Appendix A.1, sections 1 through 8 for the Capella satellite. Sections 9 through 14 apply to the launch vehicle ODAR and are not covered here.

Orbital Debris Self-Assessment Report Evaluation: Capella Mission

(based upon ODAR version 3, dated October 7, 2020)

	Launch Vehicle				Spacecraft			
Reqm #	Compliant	Not Compliant	Incomplete	Standard Not Compliant	Compliant or N/A	Not Compliant	Incomplete	Comments
4.3-1.a			✓		V			
4.3-1.b			✓		✓			
4.3-2			V		V			
4.4-1			✓		✓			
4.4-2			✓		✓			
4.4-3			✓		✓			
4.4-4			V		V			
4.5-1			V		✓			
4.5-2			V		✓			
4.6-1.a			✓		✓			
4.6-1.b			V		✓			
4.6-1.c			V		✓			
4.6-2			V		✓			
4.6-3			V		V			
4.6-4			✓		✓			
4.7-1			V		V			
4.8-1					V			

Figure 1: ODAR Review Check sheet



1. Mission Overview

Project Manager: Duncan Eddy

Mission Overview: Sequoia was launched on August 31, 2020. It was launched in an inclined (45 deg) orbit at an average altitude of 538 km. It will be operated for a tentative minimum of 3 years. Whitney 1&2 will be launched no earlier than December 2020, on a sun-synchronous orbit at an altitude between 475km and 575km. For the purpose of this document, the worst case altitude in terms of lifetime of 575 km will be used.

ODAR Summary: All the debris generated in orbit are compliant with Requirements 4.3, there is no credible scenario for breakups, the collision probability with other objects is compliant with NASA standards, the estimated nominal decay lifetime due to atmospheric drag is less than 6 years, much less than 25 years (as calculated by DAS 3.1).

Launch: Sequoia was launched in August 2020 on a Rocket Lab Electron launcher. Whitney 1&2 are currently planned to be launched on a SpaceX Falcon 9 rocket, in December 2020.

Mission Duration: Maximum Nominal Operations: 3 years, Post-Operations Orbit lifetime: 2 year until reentry via atmospheric orbital decay (worst case less than 5 years in total).

Orbit Profile: Sequoia deployed from the launch vehicle into its near-circular 45 deg inclined orbit at an altitude of 538 km. There is no transfer or parking orbit. It will maintain an altitude between 475 and 575 km using a water-based resistojet propulsion system for 3 years. Whitney 1&2 will deploy from the launch vehicle into a near-circular sun-synchronous orbit at an altitude of 525 km. They will maintain an altitude between 475 and 575 km using a RF xenon propulsion system for 3 years.



2. Spacecraft Description

Physical Description of the Spacecraft: Capella satellites have a launch mass between 90 kg and 120 kg. Two 500mm x 900mm deployable solar arrays, a 8 m^2 deployable antenna and a 3m long boom deploy from the principal bus structure.

All deployables use a frangibolt and motor based deployment system from which no debris will be generated.

Power storage is provided by Lithium-Ion cells. The batteries will be recharged by solar cells mounted on on the two deployable solar panels.

Capella attitude is estimated with an accuracy of 50 arcsec using filtering of sensor data from 2 star trackers, an IMU, sun sensors and a magnetometer. Capella attitude will be controlled by 3 reaction wheels for nominal operation and a 3-axis magnetorquer during detumbling and for wheel desaturation.

Total satellite mass at launch, including all propellants and fluids: 90 - 120 kg for all launches.

Dry mass of satellites at launch, excluding solid rocket motor propellants: 90 - 120 kg for all launches.

Description of all propulsion systems (cold gas, mono-propellant, bi-propellant, electric, nuclear): Sequoia is equipped with a water-based resistojet. It contains 1.5 kg of liquid water that is heated with redundant thermistors to ensure the water stays liquid. The maximum thrust force is 25 mN. Whitney 1&2 will be equipped with a propulsion system for station keeping. The baseline system is a xenon-based RF magnetic thruster from Phase Four. It is an electromagnetic electric propulsion system that accelerates the xenon propellant using magnetic mechanisms. It uses 1 kg of xenon for a maximum thrust force of 6 mN.



Identification, including mass and pressure, of all fluids (liquids and gases) planned to be on board and a description of the fluid loading plan or strategies, excluding fluids in sealed heat pipes: For Sequoia, the tanks are not pressurized and only contain up to 1.5 kg of water. The maximum pressure is less than 100 psia. On Whitney 1&2, the only fluid will be in the propulsion system tank. There will be 1.0 kg of xenon propellant. Xenon will be loaded onto the system to a target density which equates approximately 1,200 psia at room temperature (25degC). The maximum operating pressure (MEOP) that the system will experience is 3,000 psia at 75degC assuming a full propellant load. The propulsion system can be filled with propellant either as a standalone system of while integrated into the satellite bus via external-facing fluid and electronic interface locations. Phase Four has designed and built ground support equipment to achieve the desired xenon density load. The design has been verified using the approach described in MIL-STD-1522A, approach B (page 28).

Fluids in Pressurized Batteries: None. Capella uses unpressurized standard Lithium-Ion battery cells. Each battery has a height of 65mm, a diameter of 18mm.

Description of attitude control system and indication of the nominal attitude of the spacecraft: Capella uses 3 magnetic rods to despin the satellites during the initial tumbling phase. 3 reaction wheels oriented in the direction of the principal axes allow 3-axis control during nominal operation. The magnetorquers are also used for desaturation of the wheels. The nominal attitude will be with the solar panels in the radial direction (R for radial) and the SAR antenna pointing in the nadir direction (-R). At the end of operations, the 3-axis controller can be used to rotate the satellite into maximum drag configuration, with the SAR antenna in the opposite direction of the velocity (-T for tangential), to accelerate orbital decay.

Spacecraft Debris Released during Normal Opera-**3**.

tions

Requirement 4.3-1: Debris passing through LEO, released debris

with diameters of 1mm or larger

No release of debris will occur during the lifetime of Capella satellites. All deployments use

a frangibolt and motor based system that does not generate any debris. Additionally, there

is no probable scenario for unintentional debris generation.

Result for Requirement 4.3-1: COMPLIANT

Requirement 4.3-2: Debris passing near GEO

There will be no intentional release of debris during the lifetime of the mission, as Capella's

mission is contained in Low Earth Orbit.

Result for Requirement 4.3-2: COMPLIANT



4. Spacecraft Intentional Breakups and Potential for Explosions

Requirement 4.4-1: Limiting the risk to other space systems from accidental explosions during deployment and mission operations while in orbit about Earth or the Moon

The probability of battery or pressurized tank explosion is very low, believed to be much less than 0.001 and, due to the small mass of the satellite and its short orbital lifetime, the long-term effects of an unlikely explosion on the LEO environment are negligible. During the development process, the heat pipes have been space qualified through pressure testing, burst pressure testing, vibration testing and thermal vacuum cycling. At the end of the 3 years of nominal operations, any leftover propellant can be used to accelerate the reentry of the satellite.

Failure mode 1: Internal short circuit.

Mitigation 1: Qualification and acceptance shock, vibration, thermal cycling, and vacuum tests followed by maximum system rate-limited charge and discharge will prove that no internal short circuit sensitivity exists.

Combined faults required for realized failure: Environmental testing AND functional charge / discharge tests must both be ineffective in discovery of the failure mode.

Failure mode 2: Internal thermal rise due to high load discharge rate.

Mitigation 2: Cells will be tested in lab for high load discharge rates in a variety of flight like configurations to determine if the feasibility of an out of control thermal rise in the cell. Cells will also be tested in a hot environment to test the upper limit of the cells capability. Combined faults required for realized failure: Spacecraft thermal design must be incorrect



AND external over current detection and disconnect function must fail to enable this failure mode.

Failure mode 3: Excessive discharge rate or short circuit due to external device failure or terminal contact with conductors not at battery voltage levels (due to abrasion or inadequate proximity separation).

Mitigation 3: This failure mode will be negated by a) qualification tested short circuit protection on each external circuit, b) design of battery packs and insulators such that no contact with nearby board traces is possible without being caused by some other mechanical failure, c) obviation of such other mechanical failures by proto-qualification and acceptance environmental tests (shock, vibration, thermal cycling, and thermal-vacuum tests).

Combined faults required for realized failure: An external load must fail/short-circuit AND external over-current detection and disconnect function must all occur to enable this failure mode.

Failure mode 4: Inoperable vents.

Mitigation 4: Battery vents are not inhibited by the battery holder design or the spacecraft.

Combined faults required for realized failure: The manufacturer fails to install proper venting.

Failure mode 5: Crushing.

Mitigation 5: This mode is negated by spacecraft design. There are no moving parts in the proximity of the batteries.

Combined faults required for realized failure: A catastrophic failure must occur in an external system AND the failure must cause a collision sufficient to crush the batteries leading to an internal short circuit AND the satellite must be in a naturally sustained orbit at the time the crushing occurs.

Failure mode 6: Low level current leakage or short-circuit through battery pack case

or due to moisture-based degradation of insulators.

Mitigation 6: These modes are negated by a) battery holder/case design made of non-

conductive plastic, and b) operation in vacuum such that no moisture can affect insulators.

Combined faults required for realized failure: Abrasion or piercing failure of circuit board

coating or wire insulators AND dislocation of battery packs AND failure of battery terminal

insulators AND failure to detect such failures in environmental tests must occur to result in

this failure mode.

Failure mode 7: Excess temperatures due to orbital environment and high discharge com-

bined.

Mitigation 7: The spacecraft thermal design will negate this possibility. Thermal rise will

be analyzed in combination with space environment temperatures showing that batteries do

not exceed normal allowable operating temperatures which are well below temperatures of

concern for explosions.

Combined faults required for realized failure: Thermal analysis AND thermal design AND

mission simulations in thermal-vacuum chamber testing AND over-current monitoring and

control must all fail for this failure mode to occur.

Result for Requirement 4.4-1: COMPLIANT

Requirement 4.4-2: Design for passivation after completion of mis-

sion operations while in orbit about Earth or the Moon

Passivation will happen naturally at the end of mission by depletion of any remaining energy

contained in the batteries (either through uncontrolled tumbling in case of ADCS failure or

attitude control in case of nominal ADCS operations) and natural orbit decay and re-entry

within 6 years.



Result for Requirement 4.4-2: COMPLIANT

Requirement 4.4-3. Limiting the long-term risk to other space systems from planned breakups

There are no planned breakup during the mission.

Result for Requirement 4.4-3: COMPLIANT

Requirement 4.4-4: Limiting the short-term risk to other space systems from planned breakups

There are no planned breakup during the mission.

Result for Requirement 4.4-4: COMPLIANT



5. Spacecraft Potential for On-Orbit Collisions

Since the orientation of the spacecraft during operations will vary, the probability of collision with other objects is computed in the worst case scenario of the SAR antenna being in the direction tangential to the velocity. DAS v3.1 is used for orbit and collision analysis. It is to be noted that Capella's on-orbit collision avoidance scheme has already been implemented and TESTED SUCCESSFULLY on orbit.

Requirement 4.5-1. Limiting debris generated by collisions with large objects when operating in Earth orbit

The worst case initial orbit of Sequoia is a circular orbit at an altitude of 575 km and an inclination of 45deg. The aera/mass ratio of the spacecraft is $0.035 \ m^2/kg$ in the worst-case attitude. The computed probability of collision with large objects for Sequoia is 2.9224e-5. The worst case initial orbit of Whitney is a circular orbit at an altitude of 575 km and an inclination of 97.5deg. The aera/mass ratio of the spacecraft is $0.035 \ m^2/kg$ in the worst-case attitude. The computed probability of collision with large objects for a Whitney satellite is 9.1086e-5. The compounded probability of collision with a large object for the 3 satellites is 0.00023, below the maximum acceptable probability of 0.01.

Result for Requirement 4.5-1: COMPLIANT

Requirement 4.5-2. Limiting the probability of damage from small objects when operating in Earth or lunar orbit

The component critical for post-mission operations are the communication hardware, the attitude control system, the solar panels and the batteries. The results for each critical subsystem, for a Capella satellite, are given in the table below. The probability of damage from small objects for Sequoia is computed to be 1.2098e-4. The probability of damage from small objects for Whitney is computed to be 2.6629e-4.



The probability of damage from small objects for the 3 satellites is 0.00066, below the 0.01 requirement.

Table 1: Small Object Damage Analysis for Sequoia

Critical Surface	Probability of Penetration
ADCS	8.6860e-6
COMS	4.3430e-6
Solar Panels	1.0560e-4
Batteries	2.3469e-6
Probability of PMD Failure	1.2098e-4

Table 2: Small Object Damage Analysis for Whitney

Critical Surface	Probability of Penetration
ADCS	2.3885e-5
COMS	1.1943e-5
Solar Panels	2.2546e-5
Batteries	5.0108e-6
Probability of PMD Failure	2.6629 e-4

Result for Requirement 4.5-2: COMPLIANT



6. Spacecraft Post-mission Disposal Plans and Procedures

The orbit of the satellite will decay because of atmospheric drag and the satellites will eventually naturally de-orbit by atmospheric reentry. At the end of the spacecraft lifetime, Capella will begin the deorbit process. At the end of the mission operations, Capella will use the attitude control system to orient the satellites into a maximum drag configuration with the solar panels and SAR antenna in the direction of the velocity, accelerating the orbital decay. These high-drag periods will be interleaved with sun-pointing periods to ensure spacecraft reserve power is maintained throughout the deorbit process. Capella will maintain enough fuel in the propulsion system to maintain maneuverability as the spacecraft passes through the ISS and Tiangong-2 orbits. In the case where there propellant in excess of what is needed to safely traverse the space station orbits it will be used in a series of propulsive maneuvers to further accelerate orbital decay and reentry. Even in the case of ADCS failure and tumbling spacecraft at end of life, all Capella satellites will de-orbit well within the maximum allowable 25 year lifetime. This analysis is assuming a worst-case scenario, for lifetime purposes, of a tumbling spacecraft.

Requirement 4.6-1. Disposal for space structures in or passing through LEO

The altitude of the satellite is computed from its worst case initial circular orbits at the altitude of 575 km, in its end of mission configuration. The average area to mass ratio for the tumbling spacecraft is used $(0.028 \ m^2/kg)$. The lifetime of Sequoia and Whitneys with no orbit maintenance are computed by DAS to be 2.617 years and 2.305 years, respectively, for a maximum orbital lifetime, after 3 years of operations, of 5.617 years and 5.305 years, much below the 25 year orbital lifetime threshold.

Result for Requirement 4.6-1: COMPLIANT

Requirement 4.6-2. Disposal for space structures near GEO

There are no space structures near GEO involved in this mission.

Result for Requirement 4.6-2: COMPLIANT

Requirement 4.6-3. Disposal for space structures between LEO and

GEO

There are no space structures between LEO and GEO involved in this mission.

Result for Requirement 4.6-3: COMPLIANT

Requirement 4.6-4. Reliability of post-mission disposal operations

in Earth orbit

The above analysis has been performed with an average area to mass ratio, which means that even in the case of massive power or ADCS failure, a tumbling spacecraft, the spacecrafts

will deorbit in a worst case of 6 years.

Result for Requirement 4.6-4: COMPLIANT



7. Spacecraft Reentry Debris Casualty Risks

Requirement 4.7-1. Limit the risk of human casualty

The risk of human casualty was computed by DAS v3.1 for an uncontrolled reentry to be 1:1000000000 for the Sequoia and 1:1000000000 for Whitney satellites. This is the lowest output of the DAS software. Considering 0 energy makes it to the ground during reentry, the risk of human casualty is effectively 0. The spacecraft models and results are summarized in the tables below.

Table 3: Spacecraft Model

Component	Subcomponent
Bus	
	Batteries
	Reaction Wheels
	Avionics
	Propulsion Tanks
	Radio Stack 1
	Radio Stack 2
SAR Antenna	
	SAR Antenna Battens
	SAR Antenna Hub
	Boom
	SAR Antenna Ribs
Solar Array	
Torque Rods	
Star Trackers	
Thruster	
Antennae	
Payload	

There are a number of carbon fiber epoxy components in the satellites. These components are being modelled in DAS using the default properties of Graphite Epoxy 1.



Table 4: Human Casualty Risk Analysis - Sequoia

Component	Qty	Material	Shape	Mass (kg)	Dem. Alt. (km)	Cas. Area (m ²)	En. (J)
Bus Structure	1	Aluminum	Box	24	63.0	0	0
Batteries	64	Aluminum	Cylinder	0.0625	76.5	0	0
Reaction Wheels	3	Aluminum	Cylinder	3.2	63.1	0	0
Avionics	1	Aluminum	Box	24.7	62.6	0	0
Tanks	1	Titanium	Box	0.5	73.9	0	0
Radio Stack 1	1	Aluminum	Box	1	71.4	0	0
Radio Stack 2	1	Aluminum	Box	2.5	63.1	0	0
SAR Ant Battens	13	Carb Fiber	Cylinder	0.4	77.1	0	0
Solar Array	2	Carb Fiber	Flat Plate	2.4	76.6	0	0
Torque Rods	3	Copper	Cylinder	0.6	73.8	0	0
Star Trackers	2	Aluminum	Box	0.3	75.1	0	0
Thruster	1	Aluminum	Box	2.5	65.2	0	0
Payload	1	Aluminum	Box	4	66.7	0	0
Boom	3	Carb Fiber	Cylinder	1.3	76.7	0	0
SAR Ant Ribs	13	Aluminum	Flat Plate	0.5	77.0	0	0
SAR Ant Hub	1	Aluminum	Box	5	63.6	0	0

Table 5: Human Casualty Risk Analysis - Whitney

Component	Qty	Material	Shape	Mass (kg)	Dem. Alt. (km)	Cas. Area (m ²)	En. (J)
Bus Structure	1	Aluminum	Box	24	65.6	0	0
Batteries	64	Aluminum	Cylinder	0.0625	76.4	0	0
Reaction Wheels	3	Aluminum	Cylinder	3.2	66.0	0	0
Avionics	1	Aluminum	Box	24.7	49.8	0	0
Tanks	1	Aluminum	Box	0.5	75.8	0	0
Radio Stack 1	1	Aluminum	Box	1	72.2	0	0
Radio Stack 2	1	Aluminum	Box	2.5	65.2	0	0
Ant Battens	13	Carb Fiber	Cylinder	0.4	77.7	0	0
Solar Array	2	Carb Fiber	Flat Plate	2.4	77.7	0	0
Torque Rods	3	Copper	Cylinder	0.6	73.8	0	0
Star Trackers	2	Aluminum	Box	0.3	75.1	0	0
Thruster	1	Aluminum	Box	2.5	65.2	0	0
Payload	1	Aluminum	Box	4	66.7	0	0
Boom	3	Carb Fiber	Cylinder	1.3	76.7	0	0
SAR Ant Ribs	13	Aluminum	Flat Plate	0.5	77.0	0	0
SAR Ant Hub	1	Aluminum	Box	5	61.6	0	0

Result for Requirement 4.7-1: COMPLIANT



8. Collision risk posed by tether systems

Requirement 4.8-1. Mitigate the collision hazards of space tethers in Earth or Lunar orbits

No tethers are to be used in Capella missions.

Result for Requirement 4.8-1: COMPLIANT

END OF ODAR FOR CAPELLA

Approved: Lucas Riggi

Constellation Architect

10/07/2020 Lucas Riggi