

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:

File No. _____

**Application of Capella Space Corp. for Authority to Launch and
Operate a Non-Geostationary Orbit Satellite System in the Earth
Exploration Satellite Service**

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Application of Capella Space Corp. for Authority to Launch and Operate a Non-Geostationary Orbit Satellite System in the Earth Exploration Satellite Service

Capella Space Corp. (“Capella”) hereby requests authority to launch and operate two small satellites, Acadia-1 and Acadia-2, in low-Earth, non-geostationary orbit (“NGSO”) for provision of Earth-Exploration Satellite Service (“EESS”). A completed Form 312, accompanying Schedule S, Technical Attachment, Waiver Requests, and Orbital Debris Assessment Report (“ODAR”) are included with this application to provide the information required by the Commission’s rules. This application is submitted under the Commission’s streamlined licensing procedures governing small satellites.¹

I. Background and description of services

Capella Space Corp. is a privately held company headquartered in San Francisco, California with an additional office in Louisville, Colorado. Capella was founded in 2016 to provide space-based earth observation and analytics to organizations around the globe. Capella uses advanced synthetic aperture radar (“SAR”) capabilities to offer extremely high-resolution monitoring of the Earth’s surface with on-demand delivery of SAR imagery from a constellation of small satellites in low earth orbit (“LEO”).

Capella has been awarded multiple phase 1 and phase 2 Small Business Innovation Research grants through the U.S. Air Force and contracts with the National Reconnaissance Office, Defense Innovation Unit, National Geospatial-Intelligence Agency, U.S. Navy, Space Development

¹ 47 C.F.R. 25.122. *See also Streamlining Licensing Procedures for Small Satellites*, 34 FCC Rcd. 13077 (2019) (“*SmallSat R&O*”).

Agency, and other U.S. and foreign allied defense and intelligence customers, for ongoing development of its commercial SAR constellation and delivery of SAR imagery products and services. These U.S. and foreign allied government customers are eagerly awaiting the enhanced capabilities that the satellites described in this application would enable. Capella was granted a NOAA license for the deployment of its constellation and has been working diligently with NOAA in the implementation and adherence to the stipulations of this license, including successful completion of a Data Protection Plan approved by NOAA’s compliance regulators.

Capella has already obtained Commission authorization to launch and operate nine satellites, known as Capella-2 through Capella-10, seven of which have been deployed.² Capella respectfully requests that the Commission grant this application to allow Capella to deploy its next generation of satellites and begin offering enhanced SAR imagery and products to our federal and foreign allied government and commercial customers.

II. Description of system facilities and operations

A. Space segment

Once on orbit, the satellite will deploy a circular reflector antenna, which serves as the primary SAR payload antenna. The satellite mass at launch is approximately 150-170 kg and includes propellant used for orbit maintenance and collision avoidance.

² See Grant of Authority, SAT-LOA-20200914-00108 (granted Dec. 17, 2020); Grant of Authority, SAT-LOA-20210119-00012 (granted May 4, 2021); Grant of Authority, SAT-MOD-20210512-00067 (granted June 15, 2021); Grant of Authority, SAT-LOA-20210824-00109 (granted Dec. 15, 2021); Grant of Authority, SAT-LOA-20220309-00025 (granted May 11, 2022); Grant of Authority, SAT-MOD-20220919-00111 (granted Jan. 17, 2023).

B. Orbital information

As detailed below, the Capella satellite described in this application will operate at a nominal altitude of 600 km at an inclination of $49 \pm 7^\circ$. Capella's current launch plans could result in multiple potential LEO orbits. As described more fully in the included Technical Attachment, the information below describes the anticipated orbital characteristics resulting from currently scheduled launches and, in the case of the right ascension of the ascending node ("RAAN"), one potential value for this orbital parameter.

Satellites per Plane	2
Inclination	$49 \pm 7^\circ$
Orbital Period	$5,801 \pm 31$ sec
Apogee	600 ± 25 km
Perigee	600 ± 25 km
Argument of Perigee	N/A – Near Circular Orbit
Active Service Arc	Full Orbit
RAAN	$293 \pm 15^\circ$

Table 1 —Orbital Parameters

C. Spectrum

The proposed Capella satellites will operate in the following frequency bands:

Link Name	Band	Center Frequency	Bandwidth
EES Sensing	9300-10000 MHz	9650 MHz	700 MHz
Payload Downlink	8025-8400 MHz	8212.5 MHz	337.5 MHz
TT&C Uplink	2025-2110 MHz	2036 MHz	1.4 MHz
TT&C Downlink	8025-8400 MHz	8027 MHz	1.4 MHz
Space-to-Space Uplink	1525.0-1559.0 MHz	Assigned by Inmarsat	Assigned by Inmarsat
Space-to-Space Downlink	1626.5-1660.0 MHz	Assigned by Inmarsat	Assigned by Inmarsat

Table 2 — Frequencies of Operation

As indicated above, Capella’s satellite will also communicate with Inmarsat satellites, pursuant to an agreement with Inmarsat, using a spaceborne Inmarsat BGAN terminal operating in the L-Band. Space-to-space “uplink” transmissions to the Capella system and space-to-space “downlink” transmission to the Inmarsat system will occur pursuant to licenses held by Inmarsat. These inter-satellite communications will occur on channels dynamically assigned by the Inmarsat system and will be used by Capella for satellite tasking, allowing customer observation requests to be acted on immediately, without the need to wait until the appropriate satellite is within view of a Capella system earth station, as would be required for other TT&C operations. To facilitate these space-to-space communications, Capella seeks authority to communicate with all satellites on the Commission’s ISAT List.

Capella’s systems are designed to avoid any harmful interference with other satellite systems—including other EESS systems—and protected terrestrial systems. They will meet all applicable power flux-density (“PFD”) and other coexistence requirements even in a worst-case configuration. Moreover, due to the on-demand nature of Capella’s service, its payload and sensing transmissions will occur relatively infrequently and with low PFD on the ground, further minimizing the probability of a worst-case geometric configuration while these systems are active.

D. Ground segment and operations

Capella has contracted with commercial ground station providers Kongsberg Satellite Services (“KSAT”), Amazon Web Services Ground Station (“AWS”) and ATLAS Space Operations, which operate ground stations around the world as a service, for both payload and TT&C communications with the Capella system. In addition to allowing more efficient allocation of the costs of constructing and operating the earth station facilities themselves, this offers an innovative and highly efficient means of acquiring, storing, and processing downlinked data. Each provider has obtained or are in the process of obtaining the necessary authorizations from

regulators in their respective jurisdictions for communications with the Capella system. The ground station locations are included in an attachment to this application.

Capella ground operations are controlled from Capella's primary Mission Operations Center in San Francisco, California with a backup facility in Louisville, Colorado. In accordance with its NOAA license, Capella maintains a 24/7/365 operations hotline and on-call staff. Constellation monitoring is constant via automated and human systems allowing for quick reaction in response to technical or regulatory questions or concerns.

E. Launch schedule

The Acadia-1 and Acadia-2 satellites are scheduled to launch in Q2 and Q3 of 2023.

III. Small satellite certifications

Consistent with the requirements for streamlined treatment under Section 25.122 of the Commission's rules, Capella hereby certifies that the space station to be operated under the requested license meets the following criteria:

1. The space station will operate only in non-geostationary orbit.
2. The total in-orbit lifetime for this space station will be six years or less.
3. The space station will maintain a propulsion system, and have the ability to make collision avoidance and deorbit maneuvers using propulsion.
4. Each space station will be identifiable by a unique signal-based telemetry marker distinguishing it from other space stations or space objects.
5. The space station will release no operational debris.
6. Capella has assessed and limited the probability of accidental explosions, including those resulting from the conversion of energy sources on board the space station into energy that fragments the spacecraft.
7. The probability of a collision between the space station and any other large object (10 centimeters or larger) during the orbital lifetime of the space station is 0.001 or less as calculated using current NASA software.

8. The space station will be disposed of post-mission through atmospheric re-entry. The probability of human casualty from portions of the spacecraft surviving re-entry and reaching the surface of the Earth is zero as calculated using current NASA software.³
9. Operation of the space station will be compatible with existing operations in the authorized frequency bands. Operations will not materially constrain future space station entrants from using the authorized frequency bands.
10. The space station can be commanded by commands originating from the ground to immediately cease transmissions. Capella will have the capability to eliminate harmful interference when required under the terms of the license or other applicable regulations.
11. The space station is 10 cm or larger in its smallest dimension.
12. The space station will have a mass of 180 kg or less, including any propellant.
13. The probability that any individual space station will become a source of debris by collision with small debris or meteoroids that would cause loss of control and prevent disposal is 0.01 (1 in 100) or less.
14. Upon receipt of a space situational awareness conjunction warning, Capella will review and take all possible steps to assess the collision risk, and will mitigate the collision risk if necessary. As appropriate, steps to assess and mitigate the collision risk should include, but are not limited to: contacting the operator of any active spacecraft involved in such a warning; sharing ephemeris data and other appropriate operational information with any such operator; and modifying space station attitude and/or operations.

IV. Spectrum use and sharing capabilities

Capella is committed to ensuring equitable sharing among all licensed co-frequency spectrum users. Like other Capella satellites, Acadia-1 and Acadia-2 will operate in a manner that will avoid harmful interference, consistent with the frequency bands and usage in its authorization. Capella has signed a coordination agreement with NASA, the U.S. Air Force and other federal agencies in order to assure that critical services are not impacted by the operation of the Capella system. Detailed technical information, including a detailed discussion of compliance with all requirements for the avoidance of harmful interference, is contained in the Technical Attachment.

³ DAS is not capable of producing a value of exactly zero under any circumstances. DAS's minimum computable value is 1:100000000, which serves as the functional equivalent of zero.

A. X-band payload downlink

As described in the table below, the Capella X-Band payload downlink will operate within the 8025-8400 MHz band. As noted above, Capella and NASA, the U.S. Air Force and other federal agencies have signed a coordination agreement regarding Capella operations in the 8025-8400 MHz band and, in particular, Capella's authorized bandwidth, to ensure that Capella operations do not interfere with these federal systems.

Frequency Range	8043.75 – 8381.25 MHz
Bandwidth	337.5 MHz
Center Frequency	8212.5 MHz
EIRP	26 dBW
Polarization	RHCP / LHCP

Table 3 — Payload downlink characteristics

B. S-Band TT&C uplink

As described in the table below, Capella S-Band TT&C uplink will operate within the 2025-2110 MHz band with a maximum G/T of -23.4 dB/K, using RHCP polarization.

Frequency Range	2035.3 – 2036.7 MHz
Bandwidth	1.4 MHz
Center Frequency	2036 MHz
G/T	-23.4 dB/K
Polarization	RHCP

Table 4 — TT&C uplink characteristics

This link is used for command uplinks under the Earth Exploration Satellite Service (Earth-to-space) allocation. Non-Federal Earth-to-space transmissions may be authorized in the EESS

services subject to such conditions as may be applied on a case-by-case basis.⁴ Uplink transmissions shall not cause harmful interference to Federal and non-Federal stations operating in accordance with the Table of Frequency Allocations. A coordination agreement has been signed with NASA and other federal agencies to ensure that Capella uplinks do not interfere with critical systems of these agencies.

C. X-Band TT&C downlink

As described in the table below, the Capella X-Band TT&C downlink will operate within the 8025-8400 MHz band with a maximum EIRP of 4.5 dBW in a 1.4 MHz channel, using RHCP polarization.

Frequency Ranges	8026.3 – 8027.7 MHz
Bandwidth	1.4 MHz
Center Frequency	8027
EIRP	4.5 dBW
Polarization	RHCP

Table 5 — TT&C downlink characteristics

A coordination agreement has been signed with NASA and other federal agencies to ensure that Capella downlinks do not interfere with critical systems of these agencies.

D. X-Band SAR imaging system

As described in the table below, the Capella X-Band SAR beam will have a maximum EIRP of 78.0 dBW in a 700 MHz channel, using linear polarization.

Frequency Range	9300-10000 MHz
Bandwidth (Max)	700 MHz

⁴ 47 C.F.R. § 2.106 n. US347.

Bandwidth (Min)	10 MHz
Center Frequency	9650 MHz
EIRP	78.0 dBW
Polarization	Linear

Table 6 — SAR transmission characteristics

Capella plans to utilize the 9300-10000 MHz band for SAR imaging in the Earth Exploration-Satellite Service (“EESS”) (active). The frequency band 9900-10000 was allocated internationally for this use by the ITU at WRC-15, subject to certain conditions.⁵ However, while the FCC’s rules allow EESS (active) operations in the 9300-9900 GHz bands, the FCC has not yet harmonized its regulations with the most current international frequency allocations authorizing this service in 9900-10000 MHz. As explained in the Technical Attachment, this modest increase in bandwidth, in compliance with ITU rules, will not result in a risk of harmful interference to other operators and is consistent with authorizations the Commission has granted to other operators.

The X-Band is currently being used by other similar SAR systems, including the German TerraSAR-X satellite, the Italian COSMO-SkyMed system, the Finnish ICEYE satellites, and others licensed by China and India. The Capella SAR system generates brief pulses using a very high directivity antenna—thus minimizing both the active time as well as the affected area on the ground.

Capella’s analysis indicates that this SAR system will not cause any harmful interference to existing government, commercial, or scientific systems. Furthermore, a coordination agreement has been signed with NASA and other federal agencies to ensure that Capella SAR operations do not interfere with critical systems of these agencies.

⁵ See, e.g., Final Acts WRC-15, World Radiocommunication Conference, Geneva, 2015 (adding notes 5.474A, 5.474B, 5.474C, 5.474D).

E. Space-to-space uplink

As described in the table below, Capella plans to use a space-to-space link between its satellite and the existing commercial Inmarsat geostationary constellation.

Frequency Ranges	1525.0 – 1559.0 MHz
Bandwidth	25-200 kHz
G/T	-18.6 dB/K
Polarization	RHCP

Table 7 — Space-to-space uplink characteristics

In this case, “uplink” refers to the link from the Inmarsat GEO satellite to the Capella LEO satellite. The Capella GEO-to-LEO uplink will operate within the existing Inmarsat 1525.0-1559.0 MHz band, using RHCP polarization. These transmissions are approved and supported by Inmarsat and fall within its currently licensed spectrum. Inmarsat will provide specific channel assignments dynamically consistent with its network operations.

F. Space-to-space downlink

With respect to space-to-space communications between Acadia-1 and Acadia-2 with the existing commercial Inmarsat geostationary constellation, “downlink” refers to the link from the Capella LEO satellite to the Inmarsat GEO satellite. As described in the table below, the Capella LEO to GEO downlink will operate within the 1626.5-1660 MHz band with a maximum EIRP of 8.5 dBW and up to 200 kHz bandwidth, using RHCP polarization. (The operational bandwidth changes between 25, 50, 100, and 200 kHz, depending on data rate.)

Frequency Range	1626.5 – 1660.0 MHz
Bandwidth	25-200 kHz
EIRP	8.5 dBW
Polarization	RHCP

Table 8 — Space-to-space downlink characteristics

These transmissions are approved and supported by Inmarsat and fall within its currently licensed spectrum. Inmarsat will provide specific channel assignments dynamically consistent with its network operations.

V. Grant of the application will serve the public interest

Grant of this application will promote the public interest by facilitating the near-term deployment of enhanced SAR technology for the provision of low-cost, high-value strategic imaging services.

Because Capella's SAR satellites can see through clouds and at night, they offer complete global visibility, enabling vital decisions across dozens of industries from defense to infrastructure, saving money, time, and lives. Our space-based radar can detect sub-meter changes on the surface of the Earth. Reliably delivered, this information can protect the integrity of infrastructure, ensure food security, and help speed aid in times of crisis. Traditionally, SAR data and information derived from it has been very expensive, hard to acquire, procured by large satellites, and used mostly by the most privileged governments. Capella's existing small-satellite constellation has disrupted this status quo, making advanced imagery, with comprehensive global coverage, available to a far wider group of potential end users, including for-profit, not-for-profit, and government institutions globally. Capella's next generation of satellites will enhance this model, allowing it to offer even higher image quality and to provide a greater variety of imagery and other data products in response to diverse customer needs.

As always, Capella’s SAR constellation was designed from the ground up to achieve these important objectives in a way that minimizes any possibility of interference to other licensees (including both satellite and terrestrial operations), minimizes the risk of orbital debris, and minimizes any possibility of accidental collision. In addition to complying with the applicable ITU spectrum sharing rules, the SAR constellation was designed to comply with industry standards.

The SAR constellation features robust protections against the accidental release of orbital debris. In addition to “safeing” all reservoirs of stored energy as soon as the operational need for them has passed, Capella’s satellite will not include any store of chemically volatile propellant, instead relying on a relatively inert pressurant and an RF ion engine, which uses ionized Xenon as its propellant. The SAR constellation’s orbital characteristics and the aerodynamic design of its spacecraft form an additional layer of protection. At Capella’s requested orbital altitudes, satellites in the SAR constellation will rapidly re-enter the Earth’s atmosphere on their own due to residual atmospheric drag—a process that will be greatly accelerated by the very large deployed antenna if not counteracted by the onboard propulsion system.

Capella has built a coalition of investors, partners, and civil and military users that are working diligently to expand Capella’s world-class SAR constellation and suite of products and services. Capella is leveraging U.S. technology, expertise, and funding while at the same time maintaining the highest level of system integrity and accountability—as is shown by the close collaboration with NOAA, NASA, the U.S. Defense Innovation Unit, the U.S. Air Force, the National Reconnaissance Office, the National Geospatial-Intelligence Agency, the U.S. Navy, and Space Development Agency.

Capella’s enhanced SAR constellation will provide valuable new services for customers in the United States and around the world, enabling government and private entities to make more

informed decisions on a wide range of business and life-safety issues. Accordingly, an expeditious grant is in the public interest.

VI. Other matters

A. Related FCC authorizations

Capella was issued an experimental radio authorization under Call Sign WJ2XJE on August 31, 2018 (*see* OET ELS File No. 0066-EX-CN-2018). This license was used in the deployment and operation of Capella’s first satellite, called “Denali,” in 2018. Capella subsequently sought and obtained a modification of that license (*see* OET ELS File No. 0029-EX-CM-2020) to permit experimental operation of Capella-3 as well as an additional experimental authorization for Capella-2 under Call Sign WL2XAD, which was launched on August 30, 2020 (*see* OET ELS File No. 0228-EX-CN-2020). The Commission granted commercial authorization for the Capella-2, Capella-3 and Capella-4 satellites under Call Sign S3073 on December 17, 2020 (*see* IBFS File No. SAT-LOA-20200914-00108). The Commission granted commercial authorization for the Capella-5 and Capella-6 satellites under Call Sign S3080 on May 4, 2021 (*see* IBFS File No. SAT-LOA-20210119-00012). Capella sought and obtained a modification of that authorization (*see* IBFS File No. SAT-MOD-20210512-00067), primarily to reflect updated orbital parameters for Capella-5. The Commission granted commercial authorization for the Capella-7 and Capella-8 satellites under Call Sign S3100 on December 15, 2021 (*see* SAT-LOA-20210824-00109). The Commission then granted commercial authorization for the Capella-9 satellite under Call Sign S3137 on May 11, 2022 (*see* SAT-LOA-20220309-00025) and granted authorization for the Capella-10 satellite under Call Sign S3137 on January 17, 2023 (*see* SAT-MOD-20220919-00111).

Additionally, Capella has been engaged in a testing program of SAR technology using aircraft-mounted sensors flying at altitudes of up to 10,000 feet at several locations in the United States (*see, e.g.*, OET ELS File Nos. 0903-EX-ST-2019 and 0203-EX-ST-2020).

B. NOAA authorization

Capella was issued an updated license to operate a private remote sensing space system by NOAA's National Environmental Satellite, Data, and Information Service on July 14, 2022. The NOAA license permits Capella to operate a private constellation of up to 44 SAR satellites subject to the conditions and terms of the license. The NOAA license includes findings that Capella satisfies the requirements for compliance and monitoring, will comply with the national security concerns of the United States, and will comply with all applicable international obligations and foreign policies. Capella has successfully completed and passed multiple NOAA compliance audits and inspections since early 2019.

C. ITU compliance

Capella is aware that the ITU charges processing fees for satellite network filings. As a consequence, Commission applicants are responsible for any and all fees charged by the ITU. Capella confirms that it is aware of this requirement and accepts responsibility to pay any ITU cost recovery fees associated with this application. Invoices for such fees may be sent to the contact representative listed in the accompanying FCC Form 312.

Pursuant to 47 C.F.R. § 25.111 for space systems, it is understood that the Commission will submit filings to the ITU on behalf of Capella pursuant to international obligations for the coordination and registration of space network systems. Capella is providing the Commission the appropriate electronic files for submission to the ITU along with this application.

D. Authorization for ground-based calibration signal

In addition to the commercial operations described above, Capella requests authority to operate a ground-based system for calibrating Capella's synthetic aperture radar systems. Technical details about these proposed operations are provided in section XII of the enclosed Technical Attachment.

VII. Conclusion

For the foregoing reasons, and for the reasons set forth in the accompanying materials, Capella requests that the Commission find that granting Capella operating authority for the SAR constellation proposed herein would serve the public interest, and issue such grant expeditiously.

Respectfully submitted,

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