Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Loft Orbital Solutions Inc.	)	File No. _____
	)	
Application for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in the Earth-Exploration Satellite Service	)	

APPLICATION

Tony Lin
Emma Marion
DLA Piper LLP (US)
500 Eighth Street, N.W.
Washington, DC 20004
+1-202-799-4450

Alex Greenberg
Chief Operating Officer
Loft Orbital Solutions Inc.
321 11th Street
San Francisco, CA 94103
+1-410-382-5050

Counsel for Loft Orbital Solutions Inc.

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APPLICATION

Loft Orbital Solutions Inc. ("Loft Orbital") requests authority to launch and operate a single microsatellite, YAM-8, in low-Earth, non-geostationary ("NGSO") orbit, pursuant to 47 C.F.R. § 25.114 of the Federal Communications Commission ("FCC" or "Commission") rules. Loft Orbital is one of the first commercial service providers flying payloads on behalf of customers. By standardizing the accommodation and operation of payloads and handling the end-to-end mission on the customers' behalf, Loft Orbital reduces the time, cost, and complexity for organizations to access space. Specifically, Loft Orbital procures, deploys, and operates space infrastructure on behalf of its customers, enabling them to focus their financial and human capital resources on developing novel payload technologies as well as new techniques for exploiting space-based data and services. Ultimately, Loft Orbital intends for its service to unlock greater utility that can be derived from low-Earth orbit ("LEO") across commercial and governmental applications. Furthermore, by ridesharing multiple payloads belonging to different customers on the same spacecraft, Loft Orbital hopes to reduce the number of satellites that would have been launched if each customer had procured its own spacecraft. It is Loft Orbital's belief that this new model will reduce the administrative burden on the FCC and other regulatory bodies as well as reduce space debris. For all of these reasons, Loft Orbital submits that grant of

this application is in the public interest. Loft Orbital respectfully requests that the FCC grant this application in time to allow Loft Orbital to launch YAM-8 by October 2024, which is the earliest predicted launch window.

I. BACKGROUND AND SYSTEM DESCRIPTION

Loft Orbital is a San Francisco, California-based company incorporated in Delaware in January 2017. To date, Loft Orbital has launched four satellites and has three satellites, YAM-3 YAM-5, and YAM-6 in active operations.[1] Loft Orbital also plans to launch a fifth satellite, YAM-7, in June 2024, and will soon launch the first satellite of Loft Orbital's first constellation, YAC-1. Loft Orbital's business objective is to provide customers with the experience of rapid and turnkey access to space by handling the procurement, payload integration, deployment, and operations of the spacecraft on behalf of its customers. To facilitate this model, Loft Orbital in most cases will be responsible for regulatory compliance and licensing of the satellite mission, in addition to securing launch insurance.[2] It is Loft Orbital's long-term goal to serve as an aggregation platform for LEO payloads and in so doing reduce the need for entities to launch their own spacecraft or obtain the associated regulatory licenses, simplifying the process for deploying new and innovative satellite services and reducing administrative burdens and workloads.

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[1] *See* Stamp Grant, Loft Orbital, ICFS File No. SAT-LOA-20200907-00105 (granted May 28, 2021) ("YAM-3 Grant"); Stamp Grant, Loft Orbital, ICFS File No. SAT-LOA-20220606-00057 (granted November 15, 2022) ("YAM-5 Grant"); Stamp Grant, Loft Orbital, ICFS File No. SAT-LOA-20230414-00088 (granted January 19, 2024) ("YAM-6 Grant").

[2] To be clear, Loft Orbital owns and controls the YAM-8 satellite. Specifically, Loft Orbital regulates the power to and can shut off a payload and has the technical capability and contractual right to accept or reject payload tasking requests by customers.

Loft Orbital performs overall spacecraft integration at its facility in Golden, Colorado. The Loft Orbital satellite platform features two components. The first is a "Longbow" satellite bus derived from the OneWeb first generation bus design, which will use an identical bus for all Longbow-based missions. The second is a "Hub", a standardized payload adapter that provides a mechanical and thermal accommodation for the onboard payloads, as well as critical payload services such as power, command and control, and onboard processing capabilities. Payloads flown by Loft Orbital may be furnished by the customer, procured from a third party on behalf of the customer, or developed in-house by Loft Orbital. Customers task their payload through Loft Orbital's mission operations platform, Cockpit.

As a universal payload adapter, the Hub serves as an interface that decouples the onboard payloads from the satellite bus. This approach enables Loft Orbital to use a common, generic satellite bus for each mission, despite a variable payload configuration. The Payload Hub can either "rideshare" multiple payloads or fly a single payload as a dedicated mission. It is also payload-agnostic, as it supports a wide range of common interface types and protocols. As such, the Payload Hub can accommodate a wide range of payload types including imagers, radio frequency ("RF") payloads, technology demonstrations, and weather and scientific payloads.

The exact payload configuration on each Loft Orbital mission is driven by customer demand. Loft Orbital designates each mission in its fleet as "Yet Another Mission" or "YAM," with an ascending numerical designation.[3] The relevant customer payloads on YAM-8 are discussed below.

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[3] *See, e.g.*, YAM-3 Grant, YAM-5 Grant, and YAM-6 Grant.

A. Space Segment

As discussed in more detail in the Technical Annex, YAM-8 will use S-band frequencies (2025-2110 MHz) for data and TT&C uplinks, and X-band frequencies (8025-8400 MHz) for data downlinks and TT&C downlinks. Loft Orbital will also have onboard a software-defined radio, which will allow for the reception of L-band frequencies (1160-1606 MHz). As discussed below, the equipment will be used only for limited testing.

Loft Orbital will operate the following payloads onboard YAM-8 on behalf of its customers.

- 1 hyperspectral imager;[4]
- 1 GPS-Radio Occultation sensor
- NASA ARGOS Payload Camera

B. Ground Segment

The Mission Operations Center ("MOC") for YAM-8 will be located in Loft Orbital's San Francisco, California headquarters. The MOC will provide monitoring, control, and on-call engineering support around the clock and includes a team of full-time engineering support staff. Loft Orbital will operate YAM-8 using an in-house developed Mission Control System called Cockpit. Cockpit is secure, cloud-hosted ground software that accepts tasking requests from customers to create a spacecraft tasking schedule, which is uplinked to the YAM-8 satellite.

Loft Orbital will use the commercial ground stations identified in Exhibit D. The company may expand its future ground station network to include stations inside and/or outside the United States for the purposes of increasing opportunities for data transmissions. The

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[4] Loft Orbital is applying for a commercial remote sensing license from the National Oceanic and Atmospheric Administration ("NOAA"). *See* 15 C.F.R. Part 960.

company will request concurrence of the use of all non-U.S. ground stations[5] with Federal operators in the relevant bands prior to operating any such stations and requests authority for such communications subject to coordination with relevant Federal spectrum managers.[6]

C. Launch Schedule and Orbital Information

The YAM-8 satellite will be launched as a secondary payload and is expected to be deployed at the following target orbital parameters:

- Minimum Deployment Altitude: 570 km
- Maximum Deployment Altitude: 610 km
- Target Deployment Altitude: 590 km
- Deployment Orbit Type: Sun-Synchronous
- Deployment Inclination: 97.7 degrees ± 1.0°
- Deployment LTDN: 10:30 ± 5 minutes [7]

Loft Orbital has manifested YAM-8 on an October 2024 launch.

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[5] For U.S. ground stations, the relevant ground station operator will submit an earth station application with the FCC and initiate a formal coordination process.

[6] *See, e.g.*, YAM-5 Grant and Condition 10 ("Communications in the 2025-2110, 2200-2290 and 8025-8400 MHz frequency bands may only be with specific frequencies and 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.").

[7] Loft Orbital expects the YAM-8 spacecraft to be launched into an approximate SSO orbit, but does not intend to strictly maintain SSO throughout the spacecraft lifetime. Accordingly, Loft Orbital expects the LTDN to drift over time.

II. FREQUENCY USE

A. S-Band/X-Band Frequencies

The S-band (2025-2110 MHz, 2200-2290 MHz) and X-band (8025-8400 MHz) frequency bands each have allocations for Earth Exploration-Satellite Service ("EESS") use. Specifically, the 2025-2110 MHz (Earth-to-space) band is allocated internationally and in the U.S. for non-Federal EESS use, subject to conditions as may be applied on a case-by-case basis and the limitation that any use may not cause harmful interference to authorized Federal and non-Federal operations.[8] The 8025-8400 MHz (space-to-Earth) band is allocated internationally and in the U.S. for non-Federal EESS use on a primary basis.[9] The 2200-2290 MHz (space-to-Earth) band is allocated internationally for EESS, space research, and space operations, and is allocated in the United States for Federal EESS, space research, and space operations.[10]

YAM-8 is an EESS system that will image the earth and conduct weather forecasting. Additionally, YAM-8 will perform radio occultation ("RO") service, which is a remote sensing technique used for measuring the physical properties of the atmosphere.[11] Specifically, it relies on the detection of a change in a radio signal as it passes through a planet's atmosphere, *i.e.,* as it is occulted by the atmosphere. Accordingly, the RO service proposed by Loft Orbital meets the definition of EESS because the satellite will observe and analyze data derived from signals

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[8] *See* 47 C.F.R. § 2.106 n.US347. The 2025-2110 MHz (Earth-to-space) band is also allocated to space operations internationally. 47 C.F.R. § 2.106.

[9] The 8025-8400 MHz band is also subject to an electromagnetic compatibility analysis as may be applied on a case-by-case basis. 47 C.F.R. § 2.106 n.US258.

[10] *See* 47 C.F.R. § 2.106.

[11] *See, e.g., Radio Occultation,* Wikipedia, https://en.wikipedia.org/wiki/Radio_occultation.

passing through the Earth's atmosphere.[12] Further, this data will be used for weather forecasting, NWP modeling, and space weather forecasts and analyses, all of which is consistent with EESS activities. Accordingly, use of these frequency bands is consistent with the international and domestic frequency allocations. As discussed below, to the extent necessary, Loft Orbital requests a waiver of the U.S. Table of Frequency Allocations to conduct operations on the 2200-2290 MHz frequencies.[13]

Spectrum sharing in the proposed EESS frequencies, S-band and X-band, will be possible because YAM-8 and satellites in other similar systems transmit/receive only in short periods of time while visible to a receiving/transmitting earth station. For harmful interference to occur, satellites belonging to the different systems would have to be visible to the earth station and transmitting or receiving using the same frequencies at the exact same time. In such an unlikely event, the resulting inline interference could be avoided by coordinating the satellite transmissions so that they do not occur simultaneously. Accordingly, there is no mutual exclusivity between YAM-8 and other NGSO EESS systems using the same frequency band. Loft Orbital will also comply with technical requirements in Part 2 of the Commission's rules

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[12] *See* 47 C.F.R. § 2.1 (defining EESS as a "radiocommunication service … in which "information relating to the characteristics of the Earth and its natural phenomena … is obtained from active sensors or passive sensors on Earth satellites"); *see also* Stamp Grant, Space Sciences & Engineering LLC ("PlanetiQ"), ICFS File No. SAT-LOA-20220921-00113, at Condition 9 (granted November 6, 2023) ("GNOMES-4 Grant") (approving use of radio occultation service).

[13] See *infra* Section III.A.

and applicable International Telecommunication Union ("ITU") rules and complete coordination with the Federal operators as required.[14]

B. Radio Occultation - Global Navigation Satellite System Signals

As discussed in more detail in the Technical Annex, the RO instrument on YAM-8 is designed to collect data, *i.e.*, an RO sounding, from publicly available global navigation satellite system ("GNSS") signals from the GPS (L1 at 1575.42 MHz and L2 at 1227.6 MHz), Galileo (E1 at 1575.42 and E5 at 1207.14 MHz), GLONASS (FDMA signals centered at L1 at 1602 MHz and L2 at 1246 MHz), and BeiDou (B1 at 1575.42 MHz and B2 at 1207.14 MHz) constellations. The RO payload will collect data for Space Sciences & Engineering, LLC, d/b/a PlanetiQ ("PlanetiQ"). PlanetiQ is a Colorado-based company that sells data products collected through its RO activity to government customers and commercial parties. The FCC has previously granted PlanetiQ, as well as other operators, authority to collect radio occultation data.[15]

For science data products, obtaining RO soundings from all four GNSS constellations is critical because it greatly increases the number of RO observations per satellite, enhancing weather prediction accuracy and capabilities. In terms of sharing, conducting RO sounding

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[14] *See Space Imaging, LLC,* Declaratory Order and Order and Authorization, 20 FCC Rcd 11964 ¶¶ 26-31 (2005); *DigitalGlobe, Inc.*, Order and Authorization, 20 FCC Rcd 15696 ¶¶ 1, 15 (2005); *see also, e.g.*, YAM-5 Grant at Condition 19.

[15] *See, e.g.,* GNOMES-4 Grant; Grant, PlanetiQ, ELS File No. 0504-EX-CN-2020 (granted November 6, 2020); Grant, PlanetiQ, ELS File No. 0734-EX-CN-2021 (granted March 2, 2022); Stamp Grant, Muon Space Inc., ICFS File No. SAT-LOA-20230504-00103 (granted January 30, 2024, reissued February 29, 2024).

cannot cause harmful interference or otherwise exclude other users from using those same signals.[16]

Moreover, there is no national security or other similar concerns regarding the RO observations obtained from GLONASS or BeiDou satellites. Because of the necessary post-processing of the RO observations, which involves the use of *a priori* information about the various GNSS systems, PlanetiQ would be able to detect any deliberate falsification or spoofing of the foreign GNSS signals and would not release weather data products derived from any such signals. Indeed, the NOAA commercial data buy program allows and encourages use of all available RO signals, including specifically those from the GLONASS and BeiDou constellations.[17]

YAM-8 satellite navigation would not be conducted based on any GLONASS or BeiDou signals. Rather, conventional orbit determination for YAM-8 and on-board scheduling will be performed using GPS and Galileo data.

C. L-band Equipment Testing

As discussed above, the YAM-8 satellite will carry a software-defined radio capable of receiving L-band signals in the 1160-1606 MHz frequency bands. Loft Orbital intends only to

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[16] *See, e.g.,* Stamp Grant, Muon Space Inc., ICFS File No. SAT-LOA-20230504-00103 (granted January 30, 2024, reissued February 29, 2024) (authorizing collection of RO data and concluding that conducting RO sounding cannot cause harmful interference or otherwise exclude other users from using those same signals). Additionally, in analogous situations, the FCC has concluded that the reception of signals cannot cause harmful interference. *See, e.g., Iridium Constellation LLC*, *Order and Authorization*, 31 FCC Rcd 8675 ¶ 21 (2016); Stamp Grant, Spire Global, Inc., ICFS File No. SAT-AMD-20161114-00107 (granted in part Apr. 7, 2017) (authorizing satellite reception of AIS 1, AIS 2, AIS 3, AIS 4, ASM 1, ASM 2, and ADS-B signals).

[17] *See, e.g.,* Commercial Weather Data Program Radio Occultation Data Buy II (RODB) – 2, Request for Proposal Amendment 0002, RFP 1332KP22RNEEP0003 (August 16, 2022), at p. 9 (stating expressly that parties may obtain RO soundings from any of the four GNSS constellations).

test the capabilities of the equipment through the reception of GPS and Galileo GNSS signals and verification of the accuracy of the received data.

III. WAIVER REQUESTS

The Commission may waive any of its rules if there is "good cause" to do so.[18] In general, waiver is appropriate if (1) special circumstances warrant a deviation from the general rule; and (2) such deviation would better serve the public interest than would strict adherence to the rule.[19] Generally, the Commission will grant a waiver of its rules in a particular case if the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest.[20] Loft Orbital submits that good cause exists to waive the following allocations in the U.S. Table of Frequency Allocations.

A. U.S. Table of Frequency Allocations

1. 2200-2290 MHz (space-to-Earth)

This band is allocated internationally for EESS, space research, and space operations, and is allocated in the United States for Federal EESS, space research, and space operations.[21] Loft Orbital will transmit on these frequencies only to non-U.S. ground stations and only for limited use for certain customers' payload data. Loft Orbital's proposed use is consistent with the international allocation[22] and prior grants[23] and will be coordinated, ensuring that operations will

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[18] *See* 47 C.F.R. § 1.3; *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

[19] *See Northeast Cellular*, 897 F.2d at 1166.

[20] *See WAIT Radio*, 418 F.2d at 1157.

[21] *See* 47 C.F.R. § 2.106.

[22] *See supra* Section II.A.

[23] *See, e.g.*, YAM-6 Grant; YAM-5 Grant; Stamp Grant, Umbra Lab Inc., ICFS File No. SAT-LOA-20210616-00080 (granted December 13, 2021).

not cause harmful interference.[24] Accordingly, to the extent necessary, Loft Orbital requests a waiver of the U.S. Table of Frequency Allocations to permit use of the 2200-2290 MHz (space-to-Earth) for TT&C and payload downlinks.

2. GNSS Reception

Loft Orbital requests waiver of the U.S. Table of Frequency Allocations to conduct RO soundings of GNSS signals. Similarly, the company requests waiver of any FCC requirement to provide information about the GLONASS and BeiDou systems or request U.S. market access for those systems.[25]

Fundamentally, Loft Orbital is not seeking access to the two systems for the reception of the specific transmitted GNSS data or the provision of or use of the systems for GNSS. Rather, Loft Orbital is conducting RO soundings based on the presence of the GNSS signals to measure the amount of diffraction of the signals in the atmosphere for weather analysis purposes, as discussed above.[26]

Moreover, Loft Orbital has no information about the GLONASS and BeiDou systems that is not publicly available. The company has no relationship with the operators of those systems and would be unable to obtain any additional information.[27]

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[24] *See supra* Section II.A.

[25] The GPS and Galileo systems are permitted to provide GNSS service to the United States. *See, e.g.*, Waiver of Part 25 Licensing Requirements for Receive-Only Earth Stations Operating with the Galileo Radionavigation-Satellite Service, Order, 33 FCC Rcd 11322 (2018).

[26] This use is analogous to the sensing of radiofrequency signals. *See, e.g.*, Stamp Grant, HawkEye 360 Inc., ICFS File No. SAT-LOA-20190102-00001 (granted in part Dec. 10, 2019) (authorizing the sensing of radio frequency signals).

[27] Also, with respect to similar frequency use by other spacecraft, the FCC has not required applicants to provide any such information or seek U.S. market access for the GLONASS and BeiDou systems. *See, e.g.,* Grant, PlanetiQ, ELS File No. 0504-EX-CN-2020 (granted November 6, 2020); Grant, PlanetiQ, ELS File No. 0734-EX-CN-2021 (granted March 2, 2022).

Additionally, as discussed above, the sale of RO data is in furtherance of legislative mandates to improve U.S. weather forecasting capabilities and enhance the viability of using commercial RO data to support the federal government's weather forecasting mission. For these reasons, waiver of any FCC requirement necessary to conduct RO soundings of any GNSS signals is warranted.[28]

B. Modified Processing Round Rules

Loft Orbital requests waiver of Sections 25.156 and 25.157 of the Commission's rules, which stipulate the processing of "NGSO-like satellite systems" under a modified processing round framework.[29] Instead, Loft Orbital requests that this application be processed pursuant to the first-come, first-served procedure adopted for "GSO-like satellite systems" under Section 25.158 of the Commission's rules.[30] The Commission has previously waived the modified processing round requirement and allowed NGSO EESS systems to be processed on a first-come, first-served basis and should do so here.[31]

Spectrum sharing in the proposed EESS frequencies, S-band and X-band, will be possible because YAM-8 and satellites in other similar systems transmit/receive only in short periods of time while visible to a receiving/transmitting earth station. For harmful interference to occur,

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[28] *See, e.g.*, GNOMES-4 Grant at Condition 9 (approving the same use); Stamp Grant, Muon Space Inc., ICFS File No. SAT-LOA-20230504-00103, at Condition 9 (granted January 30, 2024, reissued February 29, 2024) (granting waiver of U.S. Table of Frequency Allocations to collect RO data).

[29] *See* 47 C.F.R. §§ 25.156, 25.157.

[30] *See* 47 C.F.R. § 25.158.

[31] *See* Stamp Grant, Planet Labs, Inc., IBFS File No. SAT-LOA-20130626-00087 (granted Dec. 3, 2013); Stamp Grant, Skybox Imaging, Inc., IBFS File No. SAT-LOA-20120322-00058 (granted Sept. 9, 2012) ("Skybox Imaging Stamp Grant"); *Space Imaging, LLC*, Declaratory Order and Order and Authorization, 20 FCC Rcd 11964 ¶¶ 9-11 (2005) ("*Space Imaging Order*"); YAM-5 Grant at Condition 18.

satellites belonging to the different systems would have to be visible to the earth station and transmitting or receiving using the same frequencies at the exact same time. In such an unlikely event, the resulting inline interference could be avoided by coordinating the satellite transmissions so that they do not occur simultaneously. Accordingly, there is no mutual exclusivity between the YAM-8 satellite and other NGSO EESS systems using the same frequency band. Loft Orbital will also comply with technical requirements in Part 2 of the Commission's rules and applicable ITU rules and complete coordination with the Federal operators as required.[32]

Because the purpose of the modified processing round is to preserve opportunities for competitive entry in frequency bands where licensing the first applicant to operate in the band would prevent subsequent applicants from using the spectrum, grant of the waiver would not undermine the rules.[33] Accordingly, waiving Sections 25.156 and 25.157 will not undermine the policy objectives of these rules, and the waiver request is justified here.

C. Default Service Rules

Loft Orbital requests a waiver of the default service rules under Section 25.217(b) of the Commission's rules.[34] The Commission has not adopted band-specific rules for the services Loft Orbital proposes to provide. Additionally, the Commission has previously granted a waiver of the default service rules to NGSO EESS and other similar applicants based on the fact that the

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[32] *See Space Imaging Order* ¶¶ 26-31; *DigitalGlobe, Inc.*, Order and Authorization, 20 FCC Rcd 15696 ¶¶ 1, 15 (2005) ("*DigitalGlobe Order*"); *see also* Stamp Grant, Planet Labs Inc., IBFS File No. SAT-MOD-20170713-00103 (granted Jul. 18, 2019); Skybox Imaging Stamp Grant; Stamp Grant, Spire Global Inc., IBFS File No. SAT-LOA-20151123-00078 (granted in part Mar. 18, 2016) ("Spire Stamp Grant"); YAM-5 Grant at Condition 19.

[33] *See, e.g.*, Space Imaging Order ¶ 10.

[34] *See* 47 C.F.R. § 25.217(b); see also 47 C.F.R. §§ 25.156, 25.157.

operators are required to comply with technical requirements in Part 2 of the Commission's rules and applicable ITU rules.[35] In these cases, the Commission concluded that, because the cited requirements had been sufficient to prevent harmful interference, there was no need to impose additional technical requirements on operations in that band and, therefore, granted the waiver requests. These same reasons warrant waiver of the default service rules here.

D. Milestone and Bond Requirements

Loft Orbital requests waiver of the Commission's milestone and bond requirements for NGSO systems.[36] Loft Orbital has manifested the YAM-8 satellite for deployment in October 2024. Moreover, Loft Orbital does not seek mutually exclusive use of the spectrum used, as discussed above. Accordingly, there can be no concerns about speculation or spectrum warehousing, and there is no basis to impose the milestone or bond requirements. Given the approaching scheduled launch date of the YAM-8 satellite, Loft Orbital requests the Commission waive the bond and milestone requirements.[37] For these reasons, Loft Orbital submits that waiver of the milestone and bond requirements is justified.

IV. ITU COMPLIANCE

Loft Orbital has prepared the ITU Advance Publication Information submission for its proposed system, USASAT-30L-5, and is contemporaneously providing this information to the

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[35] *See Space Imaging Order* ¶¶ 26-31 (2005); *DigitalGlobe Order* ¶¶ 1, 15; *see also* Stamp Grant, Planet Labs Inc., ICFS File No. SAT-MOD-20170713-00103 (granted Jul. 18, 2019); Stamp Grant, Planet Labs Inc., ICFS File No. SAT-MOD-20150802-00053 (granted Sept. 15, 2016); Stamp Grant, Planet Labs, Inc., ICFS File No. SAT-LOA-20130626-00087 (granted Dec. 3, 2013); Skybox Imaging Stamp Grant; Spire Stamp Grant.

[36] *See* 47 C.F.R. §§ 25.164, 25.165.

[37] *See, e.g.*, YAM-5 Grant at Condition 20. In the event the Commission denies this waiver request, Loft Orbital affirms that it will comply with the bond requirement.

Commission under separate cover. Contemporaneously submitted with this application is Loft Orbital's signed ITU cost recovery letter.

V. CONCLUSION

For the reasons stated above, Loft Orbital submits that the public interest would be served by expeditious grant of the application.

Respectfully submitted,

/s/ Alex Greenberg

Tony Lin
Emma Marion
DLA Piper LLP (US)
500 Eighth Street, N.W.
Washington, DC 20004
+1-202-799-4450

Alex Greenberg
Chief Operating Officer
Loft Orbital Solutions Inc.
321 11th Street
San Francisco, CA 94103
+1-410-382-5050

Counsel for Loft Orbital Solutions Inc.

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