ANDURIL

EXHIBIT A

APPLICATION FOR AUTHORITY TO LAUNCH AND OPERATE A NON-GEOSTATIONARY SATELLITE ORBIT SYSTEM

Anduril Industries, Inc. ("Anduril") respectfully requests authority to launch and operate a single non-geostationary orbit ("NGSO") satellite, ANDURIL-216, for up to five years pursuant to Part 25 of the Federal Communications Commission's rules.[1] During the mission, Anduril will test and demonstrate the geospatial awareness and space domain awareness sensing capabilities of Electro-Optical and Long-Wave Infrared sensor payloads.[2]

For the reasons discussed below and in the accompanying exhibits, Anduril's experiments will serve the public interest by advancing American research into remote-sensing technologies. ANDURIL-216's operations will not cause any harms to or the interference environment in the relevant frequency bands. Anduril therefore asks the Commission to grant this application expeditiously to support the planned launch of ANDURIL-2016 in June 2026.

I. Background

ANDURIL-216 is a single small satellite that will operate in low Earth orbit and carry a mission data processor and infrared and optical sensors, which Anduril will use for experiments involving remote sensing, Earth observation, edge computation, and space situational awareness. The images captured using these sensors will be used for internal research and development (IRAD) of imaging processing algorithms, while the mission data processor provides an edge compute platform that will allow ANDURIL-216 to ingest onboard sensor data products, exploit sensors, and autonomously make decisions at the edge. Image processing algorithms running onboard will perform image stitching to form larger images from individual frames, perform frame stacking to improve signal-to-noise ratio, and perform Resident Space Object (RSO) identification in collected space domain imagery. ANDURIL-216 is designed for an operational lifetime of up to five years. After completion of this five-year mission, the ANDURIL-216 satellite will de-orbit through natural decay.

Anduril previously submitted an application for a five-year experimental license for ANDURIL-216 on March 14, 2025, pursuant to Part 5 of the Commission's rules. On November 20, 2025, the Space Bureau notified Anduril that the application did not fall under Part 5 of the Commission's rules and dismissed the application without prejudice, advising Anduril to file the application pursuant to Part 25 instead. On November 25, 2025, the Bureau advised further that Anduril should file for special temporary authorization pursuant to Part 5 and for authorization

[1] *See* 47 C.F.R. § 25.214.

[2] Anduril has filed applications for special temporary authority pursuant to Part 5 of the Commission's rules, *see* File No. 0005-EX-ST-2026 (filed Jan. 15, 2026), and for a license to operate a remote sensing space station from the National Oceanic and Atmospheric Administration.

pursuant to Part 25. Anduril filed its application for special temporary authorization on January 15, 2026, and with this application, seeks authority to launch and operate ANDURIL-216 pursuant to Part 25 of the Commission's rules.[3] Anduril intends to launch ANDURIL-216 in June 2026. Granting this application will allow Anduril to continue ANDURIL-216's mission beyond the six-month term of the anticipated special temporary authority and for the duration of the satellite's operational lifetime.

The National Oceanic and Atmospheric Administration ("NOAA") requires a license to operate a remote sensing system.[4] Following extensive pre-application engagement and iterative review, NOAA determined that a license will likely be required for the ANDURIL-216 system; therefore, Anduril submitted a remote sensing license application to NOAA on March 14, 2025. Since then, Anduril has submitted multiple updates to the NOAA application in response to agency inquiries. Anduril intends to request that NOAA apply that submission to the present Part 5 application and to the present application, rather than file duplicative submissions. Anduril intends to continue working closely with NOAA to advance the review process.

II. Description of the ANDURIL-216 NGSO satellite.

Space Segment. ANDURIL-216 is a small NGSO satellite built by Anduril. The satellite is based on the Apex Aries bus, which uses commercial off-the-shelf components. The satellite carries the sensor payloads listed in Table 1 below to enable demonstration and testing of these sensors' geospatial awareness and space domain awareness capabilities.

Payload	Function
Long-Wave Infrared ("LWIR") Sensor	Earth remote sensing and Resident Space Object tracking
Narrow Field of View ("NFOV") Electro-Optical Sensor	Earth remote sensing and Resident Space Object tracking
Medium Field of View ("MFOV") Electro-Optical Sensor	Earth remote sensing and Resident Space Object tracking
Mission Data Processor	In-situ processing of payload data

Table 1 – Planned Payloads

Table 2 below summarizes the frequency plan for ANDURIL-216. The satellite will rely on UHF and S-band channels for telecommand, tracking, and command ("TT&C") links and X-band channel for payload data downlink, as well as S-band channels as a secondary downlink for payload data. A more detailed summary of ANDURIL-216's radiofrequency characteristics

[3] *See* 47 C.F.R. § 25.214.

[4] *See generally* 15 C.F.R. § 960.

appears in Anduril's Exhibit C, and a summary of the planned earth station characteristics for this mission appears in Exhibit D.

Link Type and Direction	Frequency Ranges
UHF Telemetry (Space-to-Earth)	400.23–400.27 MHz[5]
UHF Telecommand (Earth-to-Space)	402.83–402.87 MHz
S-band Telemetry and Secondary Payload (Space-to-Earth)	2246.5–2253.5 MHz
S-band Telecommand (Earth-to-Space)	2066–2074 MHz
X-band Payload (Space-to-Earth)	8047–8113 MHz

Table 2 – Frequency Plan

Ground Segment. The earth stations that support this mission appear in Exhibit D. Anduril is contracting with third-party providers for ANDURIL-216 to communicate with these earth stations during the mission. Three of these earth station sites are located within the United States—one in Hawaii and two in Alaska—and 8 earth station sites are located outside of the United States. The Commission has previously authorized operations of the domestic earth stations under Call Signs E220056, E220160, and E230151.

Launch Schedule and Orbital Information. The ANDURIL-216 satellite will launch onboard a SpaceX Falcon 9 rideshare as part of the Transporter-17 mission from the Vandenberg Space Force Base in California. The launch is currently planned for the second quarter of 2026. The target orbit is a circular orbit with a nominal altitude of 550 km and a ±20 km orbital altitude error, with an inclination of 97.7°. The insertion orbit that is ultimately realized is subject to change by the launch provider, SpaceX. To allow completion of these testing and demonstration activities, the ANDURIL-216 satellite is designed for an operational lifetime of up to five years. After completion of this five-year mission, the ANDURIL-216 satellite will de-orbit through natural decay.

[5] In the 400.23–400.27 MHz downlink, beacons will transmit intermittently and only upon the spacecraft's receipt of a ground command from an authorized earth station. Each beacon transmission event will not exceed 8 minutes in duration, and beacon transmissions will occur no more than 2 times per orbital period and no more than 12 times per 24-hour period.

III. Public Interest Statement

The five-year mission of the ANDURIL-216 satellite will serve the public interest by advancing American research into remote-sensing technologies, with no countervailing public interest harms. The ANDURIL-216 mission will demonstrate the functionality of the sensor payloads and their capability for supporting geospatial awareness and space domain awareness sensing. During the mission, Anduril will demonstrate successful space asset tasking and mission planning using Anduril's command and control software, "Lattice," and collect Earth and on-orbit imagery using the sensors.

The limited duration of the ANDURIL-216 mission will not interfere with any Federal or non-Federal users operating in compliance with the U.S. Table of Frequency Allocations, and as discussed below and in the accompanying Technical Annex, Anduril will comply with all applicable technical and service rules, including power flux density limits.[6] The experimental and short-term nature of Anduril's proposed operations pose no risk of harm to competition for satellite services.

IV. Waiver Requests

To the extent necessary, Anduril respectfully requests waiver of the U.S. Table of Frequency Allocations to permit the proposed TT&C uplinks in the UHF channels (402.83–402.87 MHz), secondary payload data downlinks in the S-band channels (2246.5–2253.5 MHz), and downlink transmission of images of RSOs in the proposed X-band channels (8047–8113 MHz).[7]

The Commission may waive its rules for good cause shown,[8] and waiver is appropriate where the particular facts make strict compliance inconsistent with the public interest.[9] The Commission has good cause to waive the U.S. Table for the proposed uses to the extent they are non-confirming. Granting the requested waivers will support Anduril's remote-sensing experimentation, and the limited scope, nature, and duration of ANDURUIL-216 operations present little risk of harmful interference to co-frequency users or users in adjacent bands. To the extent necessary, Anduril accepts that the proposed UHF TT&C uplinks, S-band payload downlinks, and X-band downlink transmissions of RSO images would operate on a non-interference basis.

V. Compliance with Commission Rules

Sections 25.112(a), 25.114. Anduril's application includes the applicable requirements for an NGSO space station license application under section 25.114,[10] including a completed Form

[6] *See* Exhibit C.

[7] 47 C.F.R. § 2.106. For the 402.83–402.87 MHz frequency band, US384 provides that Earth exploration-satellite services are limited to earth stations transmitting to Federal space stations. *See id.* (US384).

[8] 47 C.F.R. § 1.3.

[9] *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972) (*WAIT Radio*); *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast Cellular*).

[10] 47 C.F.R. § 25.114(a)(2), (c)-(d).

312 and Schedule S, a description of the ANDURIL-216 system and facilities,[11] an explanation of the public interest considerations in support of the application,[12] and an orbital debris mitigation plan.[13] Anduril's application therefore meets the requirements to be acceptable for filing under section 25.112(a).[14]

U.S. Table of Frequency Allocations. Anduril's proposed operations will comply with the U.S. Table of Frequency Allocations and applicable footnote conditions, subject to the waivers requested in section IV above.[15] The proposed UHF downlink channels for TT&C links (400.23–400.27 MHz) are allocated to the space research service on a co-primary basis and to the space operation service on a secondary basis.[16] The proposed UHF uplink channels for TT&C links (402.83–402.87 MHz) are allocated to the Earth exploration-satellite service on a secondary basis.[17] Anduril acknowledges the secondary status of its TT&C links in these frequency bands and certifies that it will not cause harmful interference to authorized users operating in the primary services within these bands or seek protection from harmful interference received from these users.

The proposed S-band downlink channels for TT&C and secondary payload data links (2246.5–2253.5 MHz) are allocated to the space operation service (space-to-Earth) on a secondary basis for non-Federal uses.[18] Anduril acknowledges the secondary status of its operations in this band and certifies that it will not cause harmful interference to or seek protection from interference received from primary or Federal users. Anduril also certifies that it will comply with the footnote US96, which stipulates that space operation links are limited to pre-launch testing and space launch operations and are subject to coordination with NTIA prior to each launch.[19] The proposed S-band uplink channels for TT&C links (2066–2074 MHz) are allocated to Earth-to-space and space-to-space transmissions in the space research and Earth exploration-satellite services, subject to such conditions the Commission may apply on a case-by-case basis.[20] Anduril acknowledges and certifies that it will comply with the limitations and coordination requirements (including with NTIA and with non-Federal fixed and mobile stations) found in footnotes US94 and US347.[21]

[11] *See supra* section II and Exhibit C.

[12] *See supra* section III.

[13] *See supra* Exhibits B and C.

[14] 47 C.F.R. § 25.112(a).

[15] 47 C.F.R. § 2.106.

[16] *Id.*

[17] *Id.*

[18] 47 C.F.R. § 2.106 (US96).

[19] *Id.*

[20] *Id.* § 2.106

[21] *Id.* (US94, US347).

The proposed X-band downlink channels for payload data links (8047–8113 MHz) are allocated to non-Federal uses in the Earth exploration-satellite service (space-to-Earth) on a primary basis, subject to a case-by-case electromagnetic compatibility analysis.[22]

Coordination with Federal Users. Anduril has made best efforts to pre-coordinate with the Office of Spectrum Management ("OSM") of the National Telecommunications and Information Administration for the ANDURIL-216 mission prior to the submission of this application. Anduril is continuing to work with OSM staff to ensure successful coordination with Federal users.

Compliance with Technical and Service Rules. Anduril certifies that it will comply with all applicable technical, service, and operational requirements, including limitations on the use of TT&C links under section 25.202(g)(1),[23] requirements for cessation of emissions capabilities under section 25.207,[24] and the end-of-life disposal requirements for low Earth orbit satellites under section 25.283(e).[25]

ITU Requirements. When issuing experimental authority, the Commission submits advance publication information ("API") to the International Telecommunication Union ("ITU"). In concert with this application, Anduril submits the ITU API and, in an attachment, unconditionally accepts all associated cost recovery responsibilities.[26]

[22] *Id.* (US258).

[23] *Id.* § 25.202(g)(1).

[24] *Id.* § 25.207.

[25] *Id.* § 25.283(e).

[26] 47 C.F.R. § 25.111.