Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Loft Orbital Solutions Inc.	)	File No. SAT-LOA-20260513-00196
	)	
Application for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in the Earth-Exploration Satellite Service	)	

APPLICATION

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APPLICATION

Loft Orbital Solutions Inc. ("Loft Orbital") requests authority to launch and operate a single microsatellite, YAM-30, in low-Earth, non-geostationary ("NGSO") orbit, pursuant to the Federal Communications Commission streamlined small satellite rules.[1] 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

[1] 47 C.F.R. § 25.122. As discussed below, Loft seeks waiver of the mass limit certification requirement. *See infra* Section III.B.

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 by December 1, 2026, to allow Loft Orbital to integrate YAM-30 on the vehicle scheduled to launch as early as February 2027.

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 and is operating more than a dozen satellites.[2]

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.[3] 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

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[2] *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"); Stamp Grant, Loft Orbital, ICFS File No. SAT-LOA-20240417-00080 (granted May 30, 2024) ("YAM-7 Grant"); Stamp Grant, Loft Orbital, ICFS File No. SAT-LOA-20240517-00107 (granted January 23, 2025).

[3] To be clear, Loft Orbital owns and controls the YAM-30 satellite. Specifically, Loft Orbital regulates the power to and can shut off payloads and has the technical capability and contractual right to accept or reject payload tasking requests by customers.

deploying new and innovative satellite services and reducing administrative burdens and workloads.

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.[4] The relevant customer payloads on YAM-30 are discussed below.

A. Space Segment

As discussed in more detail in the Technical Annex, YAM-30 will use S-band frequencies (2025-2110 MHz, 2220-2290 MHz) on the satellite bus and Hub radio for data and TT&C uplinks and downlinks, and X-band frequencies (8025-8400 MHz) for data downlinks and TT&C downlinks. YAM-30 will have onboard a demonstration payload operating in the S-band frequencies.[5]

Loft Orbital will also have an imager onboard YAM-30. Loft Orbital is aware that conducting Earth imaging activities requires a license from the Commercial Remote Sensing Regulatory Affairs ("CRSRA") office of the National Oceanic and Atmospheric Administration ("NOAA") and is contemporaneously applying for such a license.

YAM-30 will be launched as a secondary payload, and its expected orbital deployment and nominal operating parameters are provided in the Orbital Debris Assessment Report ("ODAR"), attached as Exhibit C.

B. Ground Segment

The Mission Operations Center ("MOC") for YAM-30 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-30 using an in-house developed Mission Control System called

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

[5] *See infra* Section II.B.

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-30 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 company will request concurrence for the use of all non-U.S. ground stations[6] with Federal spectrum managers of the relevant bands prior to operating any such stations and requests authority for such communications subject to coordination with relevant Federal spectrum managers.[7]

II. APPLICATION OF STREAMLINED RULES

Section 25.122 of the Commission's rules states that applicants filing under the streamlined rules must certify that they meet certain criteria.[8] The following table identifies the streamlined rules criteria and confirms that YAM-30 meets the criteria.

47 C.F.R. § 25.122(c) Criteria	Loft Orbital Compliance
(1) The space station(s) will operate only in non-geostationary orbit.	YAM-30 will be deployed into a target insertion altitude of 510 km +/- 20 km and will operate in low-Earth orbit.[9]

[6] 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.

[7] *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.").

[8] *See* 47 C.F.R. § 25.122; *see also Mitigation of Orbital Debris in the New Space Age*, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 4156 (2020) (Appendix A); 85 Fed. Reg. 52422 (Aug. 25, 2020).

[9] *See* attached Exhibit C, ODAR § 1.

47 C.F.R. § 25.122(c) Criteria	Loft Orbital Compliance
(2) The total in-orbit lifetime for any individual space station will be six years or less.	YAM-30 is expected to have a total in-orbit lifetime of less than six years.[10]
(3) The space station(s): (i) Will be deployed at an orbital altitude of 600 kilometers or below; or (ii) Will maintain a propulsion system and have the ability to make collision avoidance and deorbit maneuvers using propulsion.	YAM-30 will be deployed into a target insertion altitude of 510 km +/- 20 km and will also have a propulsion system.[11]
(4) Each space station will be identifiable by a unique signal-based telemetry marker distinguishing it from other space stations or space objects.	YAM-30 will have a unique transmitting telemetry channel, allowing it to be identifiable during commissioning and in-orbit activities.[12]
(5) The space station(s) will release no operational debris.	YAM-30 satellites will not release any operational debris.[13]
(6) The space station operator has assessed and limited the probability of accidental explosions, including those resulting from the conversion of energy sources on board the space station(s) into energy that fragments the spacecraft.	Loft Orbital has assessed and limited the probability of accidental explosions, including those resulting from the conversion of energy sources on board YAM-30 into energy that fragments the spacecraft.[14]
(7) The probability of a collision between each 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 or other higher fidelity model.	The probability of collision between YAM-30 and other large objects is 6.4635E-05, as calculated by the NASA Debris Assessment Software ("DAS").[15]
(8) The space station(s) 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 or higher fidelity models.	YAM-30 will be disposed of through atmospheric re-entry.[16] 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 DAS.[17]

[10] *See id.* § 6.

[11] *See id.* § 1.

[12] *See* Technical Annex § 4.

[13] *See* ODAR § 3.

[14] *See* ODAR § 4.

[15] *See id.* § 5.

[16] *See id.* § 6.

[17] *See id.* § 7.

47 C.F.R. § 25.122(c) Criteria	Loft Orbital Compliance
(9) Operation of the space station(s) will be compatible with existing operations in the authorized frequency band(s). Operations will not materially constrain future space station entrants from using the authorized frequency band(s).	Operation of YAM-30 will be compatible with existing and future operators in the authorized frequency bands, as discussed below.[18]
(10) The space station(s) can be commanded by command originating from the ground to immediately cease transmissions and the licensee will have the capability to eliminate harmful interference when required under the terms of the license or other applicable regulations.	YAM-30 can be commanded by the MOC at any time to immediately cease transmissions and to eliminate harmful interference.[19]
(11) Each space station is 10 cm or larger in its smallest dimension.	YAM-30's has a smallest dimension measuring at least 10 cm.[20]
(12) Each space station will have a mass of 180 kg or less, including any propellant.	YAM-30 will have a wet mass of approximately 181.3 kg, which is approximately 0.7% over the 180 kg limit.[21] Accordingly, Loft Orbital seeks waiver of this requirement.[22]
(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.	The small debris collision probability is 0.0021789, as calculated by the NASA Debris Assessment Software ("DAS").[23]
(14) Upon receipt of a space situational awareness conjunction warning, the licensee or operator 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.	Loft Orbital will review conjunction warnings, coordinate physical operations of YAM-30 with any operator using similar orbits, and, if necessary, mitigate collision risks to minimize operational impacts.[24]

[18] *See infra* § II.A-B.

[19] *See supra* § I.B.

[20] *See* ODAR § 2.

[21] *See id.*

[22] *See infra* § III.B.

[23] *See id.* § 5.

[24] *See* ODAR § 5.

The Commission has categorically exempted systems operating under the streamlined rules from the Part 25 processing round and default service requirements. Excluding these systems is sensible because small satellite systems eligible for streamlined processing are "designed to serve [their] purpose within a limited, relatively short period of time [and] have more limited frequency use characteristics than more traditional operations licensed under part 25."[25] In lieu of the processing round rules, the Commission requires applicants to "(a) certify that operations of its satellites will not interfere with those of existing operators, (b) certify that it will not materially constrain future operators from using the assigned frequency band(s), and (c) provide a brief narrative description illustrating the methods by which both current and future operators will not be materially constrained."[26] Loft Orbital certifies that the operations of its satellites will not interfere with those of existing operators and that it will not materially constrain future operators from using the requested frequency bands.

In the *Streamlined Processing Order*, the Commission provided examples of applications that may satisfy the required description requirement. Potentially acceptable scenarios include those where the satellite operator possesses "a limited number of earth stations and downlinks during relatively short periods of time, with the ability to effectively schedule transmissions such that future satellite entrants can be accommodated."[27] As detailed in the following sub-sections, YAM-30's activities will not materially constrain current and future co-frequency systems.

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[25] Streamlined Processing Order ¶ 80.

[26] *Id.* ¶ 81.

[27] Streamlined Processing Order ¶ 81.

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 and space research 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.[28] 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.[29] 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.[30]

YAM-30 will image the Earth and is an EESS system. 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.[31]

Spectrum sharing in the proposed EESS frequencies, S-band and X-band, will be possible because YAM-30 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* 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.

[29] 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.

[30] *See* 47 C.F.R. § 2.106.

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

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-30 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 International Telecommunication Union ("ITU") rules and complete coordination with the Federal operators as required.[32]

B. Leonardo DRS S-band Experimental Payload

The Leonardo DRS ("LDRS") S-band experimental payload will transmit and receive a 25 kHz signal at a center frequency of 2230 MHz (space-to-Earth) and 2050 MHz (Earth-to-space), respectively. The purpose of this experimental payload is to validate the end-to-end performance in operating conditions representative of future end-user missions.[33] As discussed below, Loft Orbital requests a waiver of the U.S. Table of Frequency Allocations and certain ITU requirements, as necessary, to conduct such tests.

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[32] *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.

[33] Leonardo DRS, Inc. is a U.S. defense contractor. Additional information on the company is available at https://www.leonardodrs.com/. Future end users would likely be U.S. government entities.

III. WAIVER REQUESTS

The Commission may waive any of its rules if there is "good cause" to do so.[34] 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.[35] 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.[36] Loft Orbital submits that good cause exists to waive the following waiver requests.

A. U.S. Table of Frequency Allocations

1. S-band Frequencies (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.[37] For EESS and space operations communications, Loft Orbital will transmit on these frequencies only to non-U.S. ground stations.[38] Loft Orbital's proposed use for its EESS system is consistent with the international allocation[39] and prior grants[40] and will be coordinated, ensuring that operations

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[34] *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).

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

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

[37] *See* 47 C.F.R. § 2.106.

[38] *But see infra* Section III.A (requesting waiver for use of the LDRS S-band downlink at the Beaver Creek, OH location).

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

[40] *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).

will not cause harmful interference.[41] Accordingly, Loft Orbital believes no waiver is necessary for its use of these frequency for its proposed EESS and space operations. Nonetheless, in an abundance of caution, to the extent necessary, Loft Orbital requests a waiver of the U.S. Table of Frequency Allocations to permit transmissions in the 2200-2290 MHz (space-to-Earth) band to non-U.S. ground stations for TT&C and payload downlinks.

2. LDRS Payload (2025-2110 MHz and 2200-2290 MHz)

The 2025-2110 MHz (Earth-to-space) band is allocated for EESS, space research, and space operations.[42] The 2200-2290 MHz (space-to-Earth) band is allocated in the United States only for Federal EESS, space research, and space operations.[43] Additionally, as discussed in the Technical Annex, the S-band downlink transmission exceeds the power flux density (PFD) levels specified in ITU RR 21.16. Accordingly, to permit use of these frequencies for testing of the LDRS payload, Loft Orbital requests, as necessary, waivers of the table of frequency allocations and applicable PFD limits.[44]

To test the LDRS experimental payload, Loft Orbital intends to communicate with a single ground station located in Beaver Creek, Ohio (USA). Such tests will be limited. Specifically, there will be on average two transmissions per week, and each such transmission will be approximately 5 to 10 minutes. Testing will occur for at most a one-year period. To be clear, the experimental payload will not be used for YAM-30 spacecraft operational purposes. Transmissions will be limited to a narrow 25 kHz signal on the 2050 MHz (Earth-to-space) and

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

[42] *See* 47 C.F.R. § 2.106.

[43] *See* 47 C.F.R. § 2.106.

[44] Although the Commission's rules do not specify PFDs limit for transmissions in the 2200-2290 MHz band, the Commission routinely requires that licensees comply with ITU RR 21.16.

2230 MHz (space-to-Earth) center frequencies. Loft Orbital's proposed use for the LDRS demonstration payload also will be coordinated with federal spectrum managers, ensuring that operations will not cause harmful interference.

For the avoidance of doubt, the proposed testing at the specified parameters is critical. In the intended, future operational use case, when the payload is hosted on an end-user satellite,[45] mission objectives will require the payload to transmit and receive at PFD levels consistent with the proposed transmission parameters. Operating the payload within the PFD limits specified under ITU regulations would not adequately demonstrate the payload's intended use or provide a meaningful verification of its targeted real-world performance. For the above reasons, Loft Orbital requests a waiver of the U.S. Table of Frequency Allocations and ITU PFD limits to permit testing of the LDRS S-band experimental payload, as described above and in the attached Technical Annex.

B. Maximum Mass of Satellite - 47 CFR § 25.122(c)(12)

Loft Orbital requests waiver of the requirement that the mass of the satellite not exceed 180 kg.[46] The current best estimate for the wet mass of the satellite is 181.3 kg, which is approximately 0.7% over the FCC specified limit. Loft Orbital has carefully reviewed the component list and cannot practically replace enough components to decrease mass below the 180 kg limit. Because the mass overage is modest, Loft Orbital will be operating only a single satellite under this license, and the company otherwise meets the remaining streamlined criteria, Loft Orbital submits that waiver of this requirement would be appropriate.

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[45] *See supra* note 12.

[46] *See* 47 CFR § 25.122(c)(12).

IV. ITU COMPLIANCE

Loft Orbital has prepared the ITU Advance Publication Information submission for its proposed system, USASAT-30L-7 and is contemporaneously providing this information to the Commission under separate cover. Contemporaneously submitted with this application is Loft Orbital's signed ITU cost recovery letter.

V. CONCLUSION

YAM-30 seeks to develop space infrastructure for commercial and governmental applications. This mission will deliver multiple payloads to space, reducing the administrative burden on regulatory bodies, and supports the U.S. government's goals of extending the reach of human discovery, securing vital economic interests, and laying the foundation for a new space age.[47] For the reasons stated above, Loft Orbital submits that the public interest would be served by expeditious grant of the application.

Respectfully submitted,

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[47] *See* Exec. Order No. 14369, Section (2)(d)(i), 90 Fed. Reg. 60537 (2025) (prioritizing the optimization of "space research-and-development investments to achieve [the] Administration's near-term space objectives, use emerging technologies and scientific discoveries to advance mission capabilities, and enable scientific discovery for America's long-term science and technology leadership.").

Certification of Compliance with Part 25 Streamlined Rules

I hereby certify that the spacecraft described in the associated application meets the criteria for streamlined processing established under 47 C.F.R. § 25.122(c).

/s/ Alex Greenberg

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