

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of	)	
	)	
Care Weather Technologies, Inc.	)	File No.
	)	SAT-LOA-20260730-00323
Application for Authority to Launch and	)	
Operate a Non-Geostationary Satellite Orbit	)	
System in the Earth-Exploration Satellite	)	
Service	)	

APPLICATION

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Dated: August 7, 2026

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APPLICATION

Care Weather Technologies, Inc. (“Care Weather”), in accordance with the Commission’s streamlined small satellite part 25 rules,¹ hereby files this Application requesting authorization to launch and operate four (4) small satellites designated Veery-0HA, Veery-0HB, Veery-0HC, and Veery-0HD (the “Veery-0H satellites” or “Fledgling Veery satellites”) to monitor ocean surface vector winds (“OSVW”) using a scatterometer.

Care Weather respectfully requests that the FCC grant this application by December 1, 2026, to meet the license need-by date for the launch of Veery-0HA which is manifested for no earlier than (“NET”) February 2027.

Consistent with the information required by the Commission’s Rules, Care Weather has also provided a completed FCC Form 312, accompanying Schedule S, Technical Annex, and Orbital Debris Assessment Report.

¹See 47 C.F.R. § 25.122(j). Care Weather is aware that the Federal Communications Commission (“FCC”) has recently revised its satellite rules into Part 100. However, those rules, while adopted, have not been published in the Federal Register and, accordingly, have not yet taken effect. Accordingly, Care Weather is submitting its application under the Part 25 rules.

I. INTRODUCTION

A. Care Weather Background

Care Weather is a Utah-based company founded in 2019. To date, Care Weather has launched five 1U CubeSats, with two satellites² still in active operations under the FCC’s experimental rules.

Care Weather’s mission is to deploy a constellation of low-cost weather-monitoring satellites capable of providing the United States with near-hourly refresh rates of critical OSVW data using scatterometers. Because they have an outsized impact on forecast accuracy, scatterometer measurements are a priority for national security, maritime operations, and natural disaster warnings.³ Despite this, the U.S. currently operates no scatterometers—having not launched a global instrument since NASA’s Quick Scatterometer (“QuikSCAT”) in 1999—and prohibitive costs have stalled plans for new ones, forcing the U.S. to rely on aging foreign satellites.⁴ Care Weather aims to solve this urgent national security gap by building “Veery,” a cost-effective small satellite scatterometer. This effort is supported by a broad array of federal agencies, including the National Oceanic and Atmospheric Administration (“NOAA”), the National Aeronautics and Space Administration (“NASA”), the United States Space Force (“USSF”), and the U.S. Navy.⁵

²See Call Sign WO2XWE, File No. 0436-EX-CN-2024 (authorization for Veery-0F, granted July 25, 2024, renewed June 1, 2026); Call Sign WP2XMW, File No. 1110-EX-CN-2024 (authorization for Veery-0G, granted June 27, 2025).

³See “Impact per observation” in Giovanna De Chiara and colleagues, “On the impact of scatterometer winds in coupled and uncoupled data assimilation system: preliminary results.” International Ocean Vector Winds Science Team Meeting. 2017.

⁴See E. Rodríguez et al., *The Winds and Currents Mission Concept*, 6 *Frontiers in Marine Sci.* 438 (2019) (discussing QuikSCAT heritage and continuing foreign scatterometer operations, including Advanced Scatterometer (“ASCAT”).).

⁵See NASA contract No. 80NSSC26C0070, NOAA award No. NA24OARX021G0030-T1-01, U.S. Navy (Office of Naval Research) award No. N252-108-0786, and U.S. Space Force (Space Systems Command) contract No. FA254125CB017. This is not a comprehensive list of the contracts and awards Care Weather has received.

B. Veery-0H Description

The Veery-0H satellites serve as pathfinders for the future Veery constellation, providing commercial service and enabling on-orbit testing of an advanced radar scatterometry system for space-based environmental monitoring (“SBEM”), including measurement of ocean surface vector winds. The Veery-0H satellites build upon previous satellites—which successfully demonstrated basic radar and attitude determination and control operations—to validate essential hardware and communications upgrades. The primary objective of the Veery-0H constellation is to provide the first American scatterometer on orbit in over a decade. As such, one of its primary technical objectives is to demonstrate a reliable communications architecture capable of delivering scatterometer data with low latency.

1. Space Segment

The proposed space segment consists of four non-geostationary orbit Veery-0H satellites. The Veery-0H satellites are built to the 3U CubeSat standard. Each satellite integrates Care Weather’s C-band radar scatterometer with bus systems. The satellites include multiple communication bands to ensure that they can reliably deliver critical public safety data with minimal interruption. The Technical Annex provides the spacecraft’s detailed pointing, power, antenna, and communications specifications. Collision risk, accidental-explosion risk, and post-mission disposal for the Veery-0H satellites are assessed in the accompanying Exhibit C, Orbital Debris Assessment Report.

2. Ground Segment

Mission control for the Veery-0H satellites is located at Care Weather’s headquarters in Springville, Utah. Care Weather will monitor and control all aspects of satellite operation, act upon any interference-related requests, and address technical or regulatory questions and concerns

in a timely manner.

Care Weather will use the Leaf Space commercial ground station network for payload communications and telemetry, tracking, and command (“TT&C”). A list of ground station locations used by the Veery-0H satellites is provided in the attached Exhibit D.

Care Weather plans to also deploy its own ground stations to reduce latency and add the redundancy required for such a critical public safety system. Exhibit D gives the sites planned for potential Care Weather ground stations during the license term. Care Weather will obtain the required Commission authority for each transmitting U.S. earth station before operations begin. Similarly, each foreign earth station will operate only after authorization by the relevant administration and completion of applicable coordination.

3. Frequency Plan

Care Weather seeks to operate in the frequency bands identified below in Table 1 and described in detail in the accompanying Schedule S and Technical Annex. Target assignments within the requested bands are subject to coordination.

Table 1: Veery-0H Frequency Plan

Band (MHz)	Direction	Use	Nature of Service
137.825–138	Space-to-Earth	TT&C (main)	Meteorological satellite
148–149.9	Earth-to-space	TT&C (main)	Space operation
401–402	Space-to-Earth	TT&C (backup)	Space operation
401–402	Earth-to-space	TT&C (backup) ¹	Earth exploration
1618.725–1626.5	Space-to-space	TT&C (backup)	Mobile satellite (ITU RR 4.4) via Iridium inter-satellite link
2025–2110	Earth-to-space	TT&C (main)	Earth exploration
2200–2290	Space-to-Earth	TT&C, payload data (main) ¹	Earth exploration
5250–5255	Space-to-Earth	Payload data (backup)	Space research
5250–5350	Space-to-Earth	Radar (scatterometer)	Earth exploration (active)
8025–8400	Space-to-Earth	Payload data (main)	Earth exploration

¹ Only outside U.S.

4. Applicable Services

Operations of the Veery-0H satellites are consistent with the following services.

a. Earth Exploration-Satellite Service

The ITU Radio Regulations define the Earth Exploration-Satellite Service (“EESS”) as “[a] radiocommunication service between earth stations and one or more space stations, which may include links between space stations, in which:

- information relating to the characteristics of the Earth and its natural phenomena, including data relating to the state of the environment, is obtained from active sensors or passive sensors on Earth satellites;
- similar information is collected from airborne or Earth-based platforms;
- such information may be distributed to earth stations within the system concerned.”⁶

The Veery-0H satellites use scatterometers as active sensors to obtain information relating to the characteristics of the Earth—primarily ocean surface vector winds—and distribute the resulting measurements to earth stations. This use is consistent with the EESS allocation.

b. Meteorological Satellite Service

The ITU Radio Regulations define the Meteorological Satellite Service (“MetSat”) as “[a]n earth exploration-satellite service for meteorological purposes.”⁷ The Veery-0H satellites measure OSVW to support meteorological tracking, forecasting, and model development. This use is consistent with the MetSat allocation.

⁶See ITU Radio Regulations No. 1.51; *see also* 47 C.F.R. § 2.1.

⁷See ITU Radio Regulations No. 1.52; *see also* 47 C.F.R. § 2.1.

c. Space Operation Service

The ITU Radio Regulations define the Space Operation Service (“SOS”) as “[a] radio-communication service concerned exclusively with the operation of spacecraft, in particular space tracking, space telemetry and space telecommand. These functions will normally be provided within the service in which the space station is operating.”⁸ When the Veery-0H satellites use a band on the basis of the SOS, this use is limited to spacecraft operations, such as tracking, telemetry, command, and programming. This use is consistent with the SOS.

d. Space Research Service

The ITU Radio Regulations define the Space Research Service (“SRS”) as “[a] radiocommunication service in which spacecraft or other objects in space are used for scientific or technological research purposes.”⁹ The Veery-0H satellites include new, experimental satellite hardware and software systems whose in-space behavior will be researched through testing and telemetering. Thus, they are consistent with the SRS. In addition, the use of the Veery-0H satellites for novel approaches to space-based environmental monitoring, in which remote sensing from space provides scientific-quality data for evaluation by NASA and Department of War scientists, is consistent with the SRS.

5. C-Band Active Sensor Scatterometer (5250–5350 MHz)

Care Weather seeks use of the 5250–5350 MHz band for radar scatterometry. This band is allocated to the EESS (active) on a primary basis for international use and on a secondary basis in the U.S. for non-federal use.¹⁰ The operations of the Veery-0H satellites are consistent with this service as described in the Applicable Services section above. Care Weather will coordinate

⁸See ITU Radio Regulations No. 1.23; *see also* 47 C.F.R. § 2.1.

⁹See ITU Radio Regulations No. 1.55; *see also* 47 C.F.R. § 2.1.

¹⁰See 47 C.F.R. § 2.106 n. 5.447D.

operations with Federal spectrum managers.¹¹

Scatterometers have a long operational heritage in the band: the Advanced Scatterometer (“ASCAT”) instruments on the European Organisation for the Exploitation of Meteorological Satellites (“EUMETSAT”) Meteorological Operational (“MetOp”) satellites have operated at 5.255 GHz since 2006. Care Weather has operated a C-band weather radar in this band under Part 5 experimental authority for Veery-0G.¹²

6. X-Band Payload Data Downlink (8025–8400 MHz)

Care Weather seeks use of the 8025–8400 MHz band for its main payload data downlink. This band is allocated to the EESS on a primary basis for space-to-Earth use internationally, with U.S. non-federal operations approved on a case-by-case basis, subject to electromagnetic-compatibility analysis.¹³ The operations of the Veery-0H satellites are consistent with this service as described in the Applicable Services section above. Care Weather will coordinate operations with Federal spectrum managers. Care Weather will comply with all relevant ITU obligations, as explained in Exhibit B, the Technical Annex.

7. C-Band Payload Data Downlink (5250–5255 MHz)

Care Weather seeks use of the 5250–5255 MHz band for its backup payload data downlink. This band is allocated to the SRS on a secondary basis for international and non-federal U.S. operations.¹⁴ The operations of the Veery-0H satellites are consistent with this service as described in the Applicable Services section above.¹⁵ Care Weather will coordinate operations with Federal spectrum managers.¹¹

¹¹See 47 C.F.R. § 2.106 n. 5.448A; *see also* ITU R.R. No. 5.43A. Care Weather will not claim protection from the radiolocation service and will not cause harmful interference to radiolocation.

¹²See Care Weather Technologies, Inc., Experimental Licensing System (“ELS”) File No. 1110-EX-CN-2024 (authorizing the Veery-0G satellite in 5255.1–5260.0 MHz).

¹³See 47 C.F.R. § 2.106 n. US258.

¹⁴See 47 C.F.R. § 2.106 n. 5.447D.

¹⁵See 47 C.F.R. § 2.106 n. 5.447E; *see also* 47 C.F.R. § 2.106 n. 5.447F.

8. S-Band TT&C and Payload Data Downlink (2200–2290 MHz)

Care Weather seeks use of the 2200–2290 MHz band for its main TT&C and payload data downlink operations. This band is allocated to the EESS, SOS, and SRS on a primary basis for space-to-Earth use internationally and by non-federal operators in the U.S. The operations of the Veery-0H satellites are consistent with these services as described in the Applicable Services section above. The Veery-0H satellites will use these frequencies exclusively outside of the U.S. and will comply with all relevant ITU obligations, as explained in the Technical Annex.

9. S-Band TT&C Uplink (2025–2110 MHz)

Care Weather seeks use of the 2025–2110 MHz band for its main TT&C uplink. This band is allocated to the EESS, SOS, and SRS on a primary basis for Earth-to-space use internationally and to the SOS on a secondary, case-by-case basis for Earth-to-space use by non-federal operators in the U.S.¹⁶ The operations of the Veery-0H satellites are consistent with these services as described in the Applicable Services section above. Care Weather will coordinate operations with Federal spectrum managers.

10. VHF TT&C Downlink (137.825–138 MHz)

Care Weather seeks use of the 137.825–138 MHz band for a main TT&C downlink. This band is allocated to the MetSat, SOS, and SRS on a primary basis for space-to-Earth use internationally and by non-federal operators in the U.S. The operations of the Veery-0H satellites are consistent with these services as described in the Applicable Services section above. Care Weather will coordinate operations with Federal spectrum managers.

¹⁶See 47 C.F.R. § 2.106 n. US347.

11. VHF TT&C Uplink (148–149.9 MHz)

Care Weather seeks use of the 148–149.9 MHz band for a main TT&C uplink. This band is allocated to the SOS on a primary basis for Earth-to-space use internationally and by non-federal operators in the U.S. Earth-to-space use is subject to agreement obtained under ITU No. 9.21.¹⁷ The operations of the Veery-0H satellites are consistent with this service as described in the Applicable Services section above. Care Weather will coordinate operations with Federal spectrum managers. Care Weather is aware there are other non-federal operators in this band and will coordinate its operations.¹⁸

12. UHF TT&C Uplink and Downlink (401–402 MHz)

Care Weather seeks use of the 401–402 MHz band for backup TT&C uplink and downlink. This band is allocated to the SOS on a primary basis for space-to-Earth use internationally and by non-federal operators in the U.S. The band is also allocated to the EESS and MetSat on a primary basis for Earth-to-space¹⁹ use internationally and on a secondary basis by non-federal operators in the U.S.²⁰ The UHF uplink frequencies will be used exclusively outside of the U.S.²¹ The operations of the Veery-0H satellites are consistent with these services as described in the Applicable Services section above. Care Weather will coordinate operations with Federal spectrum managers.

¹⁷See 47 C.F.R. § 2.106 n. 5.218 (Care Weather's transmissions in the band will not exceed ± 25 kHz).

¹⁸See Exhibit B. Technical Annex (Care Weather selected target frequencies that it understands do not overlap with those used by other operators).

¹⁹See 47 C.F.R. § 2.106 n. 5.264A (Care Weather Earth stations in the UHF band will have effective isotropic radiated power ≤ 7 dBW/4 kHz.)

²⁰See 47 C.F.R. § 2.106 n. US384.

²¹See 47 C.F.R. § 2.106 n. 5.264A. The maximum EIRP of Care Weather's ground stations will not exceed 7 dBW.

13. L-Band Iridium Inter-satellite Relay (1618.725–1626.5 MHz)

Care Weather seeks use of the 1618.725–1626.5 MHz band for backup TT&C. This band is allocated to the Mobile-Satellite Service (“MSS”) on a primary basis for Earth-to-space use internationally and by non-federal operators in the U.S. Care Weather requests a waiver to use this band as an Iridium customer for space-to-space communications on a non-interference, non-protection basis under ITU Radio Regulation No. 4.4 (discussed in further detail below). The Commission has granted use of this band for Care Weather and other Iridium customers in the past.²²

14. Spectrum Sharing Capabilities

The Commission has categorically exempted systems operating under the streamlined rules from the Part 25 processing-round and default service requirements. Care Weather certifies that operation of the Veery-0H satellites will be compatible with existing operations in the authorized frequency bands and will not materially constrain future space station entrants from using those bands. Each satellite communicates with a limited number of earth stations for only short intervals as satellites pass overhead, uses conservative bandwidths and spectrally efficient modulation schemes, and can cease transmissions on command from the ground. Care Weather does not claim protection from the radiolocation service and will modify transmission characteristics as needed to prevent interference to Federal users. A complete spectrum-sharing and interference analysis is provided in the Technical Annex.

²²See, e.g., Care Weather Technologies, Inc., ELS File Nos. 1840-EX-ST-2020, 1838-EX-ST-2021, 0675-EX-CN-2023, 0436-EX-CN-2024, and 1110-EX-CN-2024; *see also* Capitol Technology University, ELS File No. 0033-EX-CN-2017; *see also* Thomas Jefferson High School Partnership Fund Inc., ELS File No. 0950-EX-CN-2018.

C. Launch Schedule

Table 2 summarizes the planned launch schedule. Care Weather respectfully requests that the FCC grant this application by December 1, 2026, to meet the license need-by date for the launch of Veery-0HA manifest for NET February 2027.

Table 2: Veery-0H Launch Schedule

Satellite	Launch Window
VEERY-0HA	February 1, 2027–November 30, 2027
VEERY-0HB	April 1, 2027–March 31, 2028
VEERY-0HC	July 1, 2027–May 31, 2028
VEERY-0HD	October 1, 2027–August 31, 2028

II. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST

Care Weather submits that a grant of this application is in the public interest. Authorization of the Veery-0H mission described above will let Care Weather convert scatterometry capability into concrete public benefits.

U.S. weather and climate disasters cost an average of ~\$150 billion per year from 2020 through 2024, with tropical cyclones being the costliest category by far.²³ Tropical cyclones are also major contributors to reduced life expectancy; the average tropical cyclone landfall is linked to roughly 7,000–11,000 excess deaths over the following fifteen years, which is orders of magnitude above official tallies of immediate storm deaths.²⁴ Those excess deaths reflect people dying earlier than they otherwise would, as displacement, disrupted care, and lasting economic harm cascade through affected communities.

Today, public forecasters depend on a small set of foreign scatterometers that leave 10–40 hour coverage gaps,²⁵ so observations are rarely available when needed. A constellation of

²³See NOAA National Centers for Environmental Information, *U.S. Billion-Dollar Weather and Climate Disasters*.

²⁴See R. Young & S. Hsiang, *Mortality caused by tropical cyclones in the United States*, *Nature* (2024).

²⁵See P. Walton, A. Laraway & D. Long, *Veery, the small satellite scatterometer for hourly, global refresh of ocean surface vector winds*, *Proc. Small Satellite Conference* (2025).

scatterometers could monitor ocean surface vector winds globally on an hourly cadence. This persistent, global coverage will enable to America to track, study, and predict hurricanes with unprecedented accuracy, giving communities earlier warnings and longer lead times needed to save lives and livelihoods.

Grant of this application also supports national security. Defense and maritime users of SBEM data prize scatterometers because of their potential to pierce the rain and clouds of extreme storms, where accurate predictions are matters of life and death. Persistent blackouts in coverage of global ocean winds have triggered unnecessary storm sorties costing \$10–\$100 million, and allowed unforeseen hurricane winds to damage hundreds of millions of dollars of aircraft. The U.S. cannot afford to fall behind as China currently operates five scatterometers with plans for eight by the end of the decade.²⁶ The Veery-0H constellation marks the beginning of renewed U.S. leadership in monitoring of ocean winds and the inception of a constellation capable of hourly, global refresh, securing maritime commerce and national defense.

In light of these benefits to public safety and national security, Care Weather submits that grant of this application will strongly serve the public interest.

III. SMALL SATELLITE CERTIFICATIONS

Care Weather hereby certifies that the Veery-0H satellites meet the streamlined processing criteria for small satellites listed in Table 3.

Table 3: Veery-0H Small Satellite Certifications

Streamlined Requirement	Care Weather Compliance
(1) The space station(s) will operate only in non-geostationary orbit.	The Veery-0H satellites will be deployed below 600 km and operate only in low-Earth, non-geostationary orbit.
(2) The total in-orbit lifetime for any individual space station will be six years or less.	Each Veery-0H satellite is designed to have a total in-orbit lifetime of six years or less.

²⁶See J. Zou, *Near-real-time Sea-surface Wind Derived from the Haiyang-2B/C/D Scatterometer Constellation*, International Ocean Vector Wind Science Team Meeting.

Table 3: Veery-0H Small Satellite Certifications (continued)

Streamlined Requirement	Care Weather Compliance
(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.	The Veery-0H satellites will be deployed at an altitude of approximately 510 km.
(4) Each space station will be identifiable by a unique signal-based telemetry marker distinguishing it from other space stations or space objects.	Each Veery-0H satellite will use a unique signal-based telemetry marker so that its telemetry stream can be distinguished from other Veery-0H satellites and other space objects during commissioning and operations.
(5) The space station(s) will release no operational debris.	The Veery-0H satellites will not release any operational debris.
(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.	Care Weather has assessed and limited the probability of accidental explosions as described in Exhibit C, the Orbital Debris Assessment Report.
(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 each Veery-0H satellite and other large objects is 0.001 or less, as calculated in Exhibit C, the Orbital Debris Assessment Report using NASA software.
(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.	Each Veery-0H satellite will be disposed of through passive atmospheric re-entry. The probability of human casualty from surviving debris is zero, as calculated in Exhibit C, the Orbital Debris Assessment Report using NASA software.
(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).	Care Weather certifies that Veery-0H operations will not interfere with those of existing operators and will not materially constrain future operators from using the assigned frequency bands. Apart from their earth sensing radars, the Veery-0H satellites will only transmit/receive in short duty cycles when in line of sight of a limited number of earth stations. The Technical Annex details how the Veery-0H satellites will avoid harmful interference scenarios.
(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.	Care Weather can command each Veery-0H satellite from the ground to immediately cease transmissions and will have the capability to eliminate harmful interference when required under the license or applicable regulations.
(11) Each space station is 10 cm or larger in its smallest dimension.	The smallest dimension of the Veery-0H satellites greater than or equal to 10 cm.
(12) Each space station will have a mass of 180 kg or less, including any propellant.	Each Veery-0H satellite has a wet mass of 4.0 kg or less.

Table 3: Veery-0H Small Satellite Certifications (continued)

Streamlined Requirement	Care Weather Compliance
(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 or less.	The probability that any Veery-0H satellite will become a source of debris due to collision with small debris or meteoroids that would cause loss of control and prevent disposal is 0.01 or less, as calculated in Exhibit C, the Orbital Debris Assessment Report.
(14) Upon receipt of a space situational awareness conjunction warning, the operator will review and take all possible steps to assess and, if necessary, mitigate collision risk, including contacting the operator of any active spacecraft involved, sharing ephemeris and other appropriate operational information, and modifying space station attitude and/or operations.	Upon receipt of a space situational awareness conjunction warning, Care Weather will review and take all possible steps to assess and, if necessary, mitigate the collision risk. These steps may include contacting the operator of any active spacecraft involved, sharing ephemeris and other appropriate operational information, and modifying Veery-0H operations.

IV. REQUESTS FOR WAIVER

The Commission may waive any of its rules if there is “good cause” to do so.²⁷ 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. Generally, the Commission will grant a waiver if the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest. Care Weather submits that good cause exists to waive the following rule.

A. Iridium Mobile-Satellite Service Inter-Satellite Relay

Each Veery-0H satellite will have an inter-satellite link transceiver, which will communicate with the Iridium satellite network as a customer of Iridium. The Iridium terminal will transmit and receive in the 1618.725–1626.5 MHz frequency band, which is allocated on a primary basis to the MSS (Earth-to-space). Because the allocation does not provide for space-to-space operations, Care Weather requests a waiver of the U.S. Table of Frequency Allocations and any other applicable FCC rule to communicate with Iridium satellites on a non-interference, non-protection basis

²⁷47 C.F.R. § 1.3; *see Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969).

under ITU Radio Regulation 4.4. Consistent with prior grants,²⁸ Care Weather expects Iridium to file a separate companion application for authority to conduct such communications.

Care Weather is a customer of Iridium. Transmissions will occur only on frequencies that Iridium assigns to the terminals onboard the Veery-0H spacecraft. Care Weather understands that transmissions are on a non-conforming basis and will not claim protection from, or cause harmful interference to, authorized services in the band. For the above reasons, grant of the waiver is justified.

V. OTHER MATTERS

A. NOAA Authorization

NOAA requires a license to operate space-based remote sensing systems.²⁹ Care Weather is currently seeking the necessary NOAA authorization for the Veery-0H satellites.³⁰

B. ITU

Care Weather has prepared the ITU filings for its proposed system, designated USASAT-30-8, and is providing this information to the Commission under separate cover, contemporaneously with this filing. Attached as Exhibit E is an ITU cost-recovery letter.

VI. CONCLUSION

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

²⁸ See, e.g., Care Weather Technologies, Inc., ELS File Nos. 1840-EX-ST-2020, 1838-EX-ST-2021, 0675-EX-CN-2023, 0436-EX-CN-2024, and 1110-EX-CN-2024; see also Capitol Technology University, ELS File No. 0033-EX-CN-2017; see also Thomas Jefferson High School Partnership Fund Inc., ELS File No. 0950-EX-CN-2018.

²⁹ See generally 15 C.F.R. Part 960.

³⁰ NOAA has previously granted an Earth remote sensing license for three satellites (Veery-0E, Veery-0F, and Veery-0G) in the Fledgling Veery series.

Respectfully submitted,

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Dated: August 7, 2026

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/ M. Patrick Walton

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Dated: August 7, 2026