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28 June 1996

Via Overnight Delivery

Federal Communications Commission c/o Mellon Bank 3 Mellon Bank Center 525 William Penn Way 27th Floor, Room 153-2713 Pittsburgh, Pennsylvania 15259-0001 (Attention: Wholesale Lockbox Shift Supervisor)

Please Direct to:

Ms. Fern J. Jarmulnek

Chief, Satellite Policy Branch

Satellite & Radiocommunications Division

Re: Modification of Authorization: EarthWatch Incorporated: File No. DA 95-1707

Dear Ms. Jarmulnek:

EarthWatch Incorporated ("EarthWatch") hereby applies for authority to modify its authorization to construct, launch and operate its low-Earth orbit (LEO) remote-sensing satellite system; DA 95-1707 (*See also*, Files 21/22-DSS-P-93; 43 DSS-LA-94(2); 52-SAT-AMEND-95) to add two additional satellites to the system.

EarthWatch currently holds an FCC authorization to construct, launch and operate a remote sensing satellite system consisting of two satellites and associated ground stations.

Two additional satellites have been licensed by the National Oceanic and Atmospheric Administration ("NOAA") pursuant to the Land Remote Sensing Commercialization Act (15 U.S.C. § 4201 et seq.). Consequently, we are requesting the Commission to modify the EarthWatch FCC authorization to add two additional remote sensing satellites to the authorized EarthWatch system.

EarthWatch Incorporated: "An Imaging and Information Company"

The two new satellites will be very similar to the previously authorized satellites in terms of the communications systems and their operation, with a few improvements as follows:

- The inclination of the orbits will be 52 degrees and the altitude of the orbits will be 600 kilometers to improve the data gathering characteristics of the system;¹
- Component design life has been increased to five years;
- The resolution of the optical sensors will be improved to 1 meter IFOV panchromatic and 4 meters IFOV color;²
- The bandwidth of the space-to-earth data downlink³ will be increased to 350 MHz to handle the increased data flow resulting from the increased resolution of the optical sensors;⁴
- Downlink telemetry transmissions will be moved to the band 8025 8400 MHz and operate in a 4.2 MHz channel consistent with the data down-link frequencies and to avoid over crowding in the band presently utilized.
- Uplink telemetry transmission will be moved to the band 2025 2110 MHz and operate in a 30 KHz channel.
- Construction of the two satellites will commence in the fall 1996, expected completion in December 1997, anticipated launch in January 1998, and estimated date of placement into service in February 1998.

EarthWatch will coordinate with other agencies to ensure that the systems are compatible with other authorized users in the same or adjacent bands.

Pursuant to the Commission's rules, we enclose a completed fee processing form (FCC Form 159) and a check in the amount of five-thousand seven-hundred forty dollars (\$5740) made payable to the Federal Communications Commission to cover the cost of the requisite filing fee

Precise orbit characteristics are controlled by the Department of Commerce and may not be changed without prior approval of the Department of Commerce.

Spatial resolution is one of the technical characteristics which was carefully reviewed by the Department of Commerce and subjected to review by the Department of Defense and the State Department prior to approval.

A further technical description of the communications system is attached in Appendices 1-6.

The downlink will operate in the same band as the previously authorized satellites; 8025 - 8400 MHZ.

for modification of space station authorization. We include an extra copy of this modification marked "Return Copy" and kindly request that you date-stamp it and return it to EarthWatch in the enclosed envelope.

Please call the undersigned or EarthWatch's Washington, D.C. counsel, Mr. Dennis James Burnett, if you have any questions regarding this modification.

Very truly yours,

Howard J. Gannes Vice President

EarthWatch Incorporated

cc: Dennis James Burnett, Esquire Pierson & Burnett, L.L.P.

1667 K St., N.W., Suite 801 Washington, D.C. 20006 (202) 466-3044 (telephone) (202) 466-3055 (facsimile)

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Appendix 1

EarthWatch IA Spacecraft Communications Overview

The EarthWatch IA communications architecture is shown in Figure 1. The EarthWatch IA spacecraft, an enhanced satellite system from EarthWatch, designed to improve ground image resolution will require an increase in downlink bandwidth. The system will communicate through Remote Ground Terminals (RGTs) in Italy, Japan, and the U.S. to and from the Mission Control Center (MCC) in Longmont, CO, USA. Links between the RGTs and the MCC will be established commercial satellite or terrestrial channels.

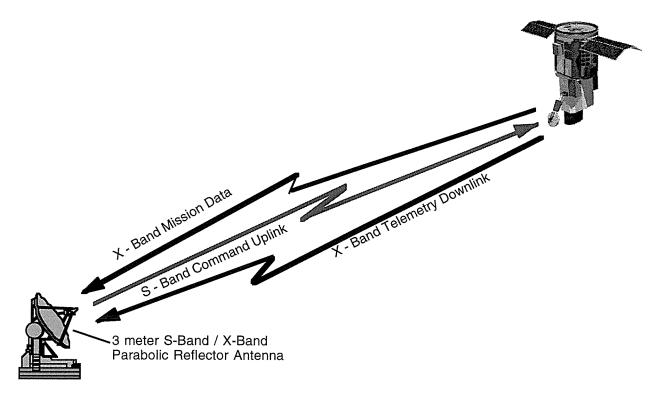


Figure 1 EarthWatch IA Communications Architecture

The EarthWatch IA space-ground communication links are described in Figure 2. The 320 Mbps wideband downlink will transmit compressed image data to the EarthWatch RGTs using the 8025 - 8400 MHz Earth Exploration Satellite X-band frequency allocation. The command uplink requires a 2 KHz channel in the 2025 - 2110 MHz STDN frequency allocation; the telemetry downlink resides in a 4.2 MHz channel at approximately 8030 MHz in the Earth Exploration Satellite allocation. All communications to and from the spacecraft will occur only while the vehicle is in view of a RGT. The additional command and telemetry frequencies requested for the EarthWatch IA spacecraft are required to support enhanced operations for an expanded constellation of spacecraft.

Link	Center	Modulation	Bandwidth / Data Rate	Encryption
	Frequency			
Wideband Data	8185 MHz	QPSK	160 MHz / 320 Mbps	No (TBR)
Command	2025-2110 MHz	FSK Tones	30 KHz / 2 Kbps	Yes
Uplink	(one channel)			
Telemetry	$8030~\mathrm{MHz}$	PCM/BPSK/PM	4.096/16.384 Kbps on	Yes
Downlink	(two channel)		1.7 MHz sub carrier	
			256 Kbps on the carrier	

Figure 2 EarthWatch IA Space-Ground Communication Links

Wideband Data Downlink

The Wide-Band Data Downlink, shown in Figure 3, will contain compressed image data. The 320 Mbps, QPSK downlink is centered at 8185 MHz. The wideband downlink flux density level is kept below the ground flux density levels specified in ITU Radio Regulation 2570 by emitting only enough energy (with adequate margin) as required by a 3 meter Remote Ground Terminal antenna. This design provides 4.1 dB of link margin and a minimum of 2 dB of margin with respect to ITU Radio Regulation 2570, detailed in Appendix 3. This link design also provides 4 dB of margin with respect to the -176 dBW/m² / 4 KHz flux density levels at geosynchronous orbit given in ITU Radio Regulation 2631. During normal operation the flux density is -210 to -220 dBW/ m² / 4 KHz at geosync given the 30 to 40 dB front to back ratio of the transmit antenna. EarthWatch is mindful of the users in the band and has participated in the X-band workshops with NASA to assure system compatibilities.

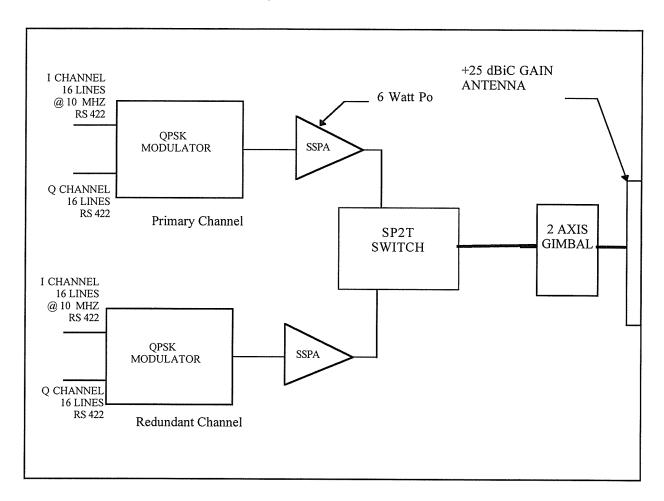


Figure 3 Wide-Band Data Downlink Functional Diagram

Particular care will be taken to ensure that out of band emissions in the 8400-8500 MHz NASA Deep Space Network band will be below the CCIR recommended limit. This is accomplished by a combination of bandpass filtering on the spacecraft and operational restrictions. In the band from 8400 - 8500 MHz the ground flux density level at the Deep Space Network site will be at least 4 dB below the recommended limit of -255.1 dBW/m² / Hz. Appendix 2 gives the link calculations; Appendix 3 shows the flux density margins.

Command Uplink

The command uplink (ref. Figure 4) will convey commands that manage the operation of the spacecraft including the sensor subsystem. Adequate link margins and omni-directional antennas on the spacecraft will allow positive control during normal and anomalous operations. Commands to the spacecraft will be encrypted and authenticated to preclude unauthorized access and control. The commands will be encrypted at the EarthWatch Longmont, CO Mission Control Center before routing to any of the RGTs.

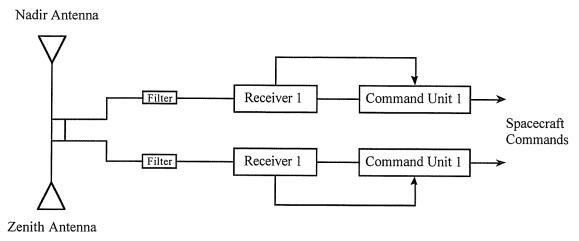


Figure 4 EarthWatch IA Command Uplink

All commands will be verified for correct word length, parity, and command decoder identification code. This will preclude the execution of corrupted commands. In addition critical commands will be protected using arming commands, so that a single inadvertent command cannot cause permanent damage to the satellite or its payload. The RGT radiated RF power will be adjustable so as to use the minimum power needed in order to guarantee a usable link. This will minimize the opportunities for co-channel interference with other users of the STDN uplink allocation. This design will conform to the limits on EIRP on Earth Station uplinks between 1-15 Ghz as specified in RR 2541. Appendix 4 gives the link calculations for the command uplink.

Telemetry Downlink

The telemetry downlink (ref. Figure 5) will contain spacecraft and sensor health and status data along with the information necessary for the processing and geolocation of the imagery. This link is encrypted to preclude unauthorized use of the image data on the wideband link.

Nadir Antennas Transmitter 1 RF Switch

Transmitter 1

Zenith Antenna

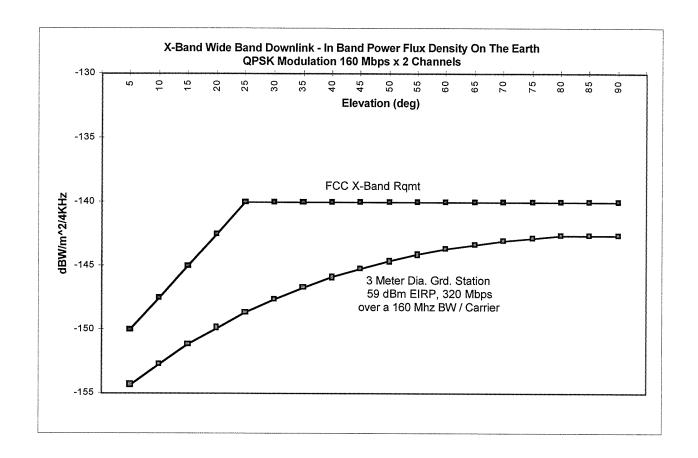
RF Coupler

Figure 5 EarthWatch II Telemetry Downlink

The spacecraft can switch between omni-directional antennas with adequate link margins to assure contact can be maintained with the spacecraft under all conditions and a nadir-only antenna for increased gain during higher-rate normal operations. All commands to the spacecraft will be returned in the telemetry downlink for verification. The telemetry link calculations are shown in Appendix 5. The downlink flux levels will meet the requirements of ITU Radio Regulation 2557 by a minimum of 1.78 as shown in Appendix 6.

320 MHZ DATA RATE DOWNLINK ANALYSIS						
Fo=8.185 GHz						
DOWNLINK PARAMETERS:						
Frequency:	8.185 GHz					
Orbit Height in km	600 Km					
Local elevation angle above hor.	5 degrees					
Data Rate	320 Mbps					
Bandwidth	171.2 Mbps					
Spacecraft Ant EIRP @ max scan	58.9 dBm					
Slant Range:	2327.8 km					
Ground Antenna G/T:	23 dB/K					
BER	1.00E-					
Dogwined The Mar (Mither and Ordina)	09					
Required Eb/No (Without Coding) Hardware Imp. BER Loss:	12.55 1.5 dB					
LINK CALCULATION:	1.5 ub					
TOTAL POWER TO GROUND:						
Satellite EIRP dBm	58.9 dBm					
Path Loss:	-178.1 dB					
Total Loss (Rain, Polarization, Ect.)	-3.0 dB					
RECEIVER SENSITIVITY:	0.0 0.2					
Required Eb/No	10.1 dB (With Coding Gain & Hardware BER Losses)					
Available Eb/No	14.1 dBm					
DOWNLINK MARGIN:	4.1 dB					
ANTENNA SIZES:						
Spacecraft Antenna Segment						
Spacecraft Dish Diameter	11 inches					
Approx. HPBW	9.01 degrees					
Gain of Spacecraft Antenna	25.0 dBi					
Loss Between HPA out & Ant. input	1.5 dB					
Transmitter Po	3.5 Watts (@ xmitter output)					
EIRP of satellite Ant. System	58.9 dBm ` ′					
Ground Antenna Segment						
Ground Antenna G/T:	23 dB/K					
System Noise Temperature:	187.2 K (Referenced at Aperture)					
Directivity Gain Ground Antenna	45.7 dBiC					
Ground Dish Diameter:	3.0 meters					
Approx. HPBW	0.8 degrees					

Appendix 3, Power Flux Density; Wideband Downlink



Appendix 4, S-Band Command Uplink Link Analysis

517	COMMAND UPLINK	OMNI ANTEN	OMNI ANTENNA NOMINAL			
	Earth Watch					
	FREQUENCY 2.2 GHz	TIPE WAYELENG				
		EIRP WAVELENG		0.1363636METERS		
	ALTITUDE 600 KM COMMAND DATA ON TONES		TRANGE = Data rate	2329.0127KM 2 KBPS		
	CMD MOD INDEX 1		MARGIN	dB dB		
	OWD WOD HADEX		CARRIER	18.1		
			CMD	13.1		
			CIVID	10.1		
	ANTENNA: OMNI NOMINAL	+/-75 DEG				
			100			
	PARAMETER	UNITS		VALUE		
1	UPLINK EIRP (35.7dB, 25 W)	dBW	dBW 78.0			
2	FREE SPACE DISPERSION LOSS	3 dB	dB			
3	ATMOSPHERIC LOSS 42 mm/hr	dB	dB 0.4			
1	S/C ANTENNA GAIN < +/- 75DEG	dBi	dBi -5.0			
	POLARIZATION LOSS	dB	dB -3			
_	S/C LINE LOSS	dB				
7	TOTAL S/C RECEIVED POWER	dBm	dBm -98.9			
	CARRIER PERFORMANCE					
		15				
1	NET RECEIVED POWER MIN CARRIER ACQUIS POWER	aBm dBm	dBm -98			
1	MARGIN CARRIER ACQUISITION					
}	MANGIN CANNIEN ACQUISITION	αь		18.1		
	COMMAND CHANNEL PERFORM	ANCE (MI = 1.0)				
11	NET RECEIVED POWER	dBm		-98.9		
1	MINIMUM CMD CHANNEL POWER			-112.0		
13	COMMAND DESIGN MARGIN	dB		13.1		

Appendix 5, Narrowband Downlink Link Analysis

	TELEMETRY DOWNLINK	R/T,PBK/NADIR	ADIR			
	Earth Watch FREQUENCY 8.2 GHz POWER 5 WATTS ALTITUDE 600 KM REAL TIME DATA ON 1.7, PCM/PSK/PI PLAY BACK DATA PCM/PM R/T MOD INDEX 0.5 PBK MOD INDEX 1	WAVELENGTH 5 DEG SLANT BANGE =	2329.013 KM 16.384 KBPS 256 KBPS			
20	ANTENNA: NADIR					
	PARAMETER	UNITS	VALUE			
1	TOTAL TRANSMIT POWER	dBm	37.0			
_	PASSIVE LOSS	dB	-2.5			
	S/C ANTENNA GAIN >+/- 90DEG	dBi	-9.0			
	FREE SPACE DISPERSION LOSS	dB	-178.1			
	ATMOSPHERIC LOSS GROUND STATION G/T (spec)	dB	-1.0			
	TOTAL RECEIVED POWER/T	dB/K dBm/K	24.8			
	BOLTZMAN CONSTANT	dBm/Hz/K	-128.8 -198.6			
	TOTAL RECEIVED POWER/KT	UDIII/HZ/K	69.8			
	CARRIER CHANNEL					
10	CARRIER/TOTAL POWER	dB	-5.9			
11	CARRIER POWER/KT (min)	dBm/Hz/KT	63.9			
	CARRIER LOOP BW (60 Hz)	dB-Hz	17.8			
	CARRIER/NOISE	dB	46.1			
	REQUIRED CARRIER/NOISE	dB	15.0			
15	CARRIER MARGIN	dB	31.1			
	DATA CHANNEL (PCM/PM) (playback)					
1	DATA/TOTAL POWER (MI=1.0)	dB	-2.1			
	DATA POWER/KT	dBm/Hz/KT	67.8			
	INFORMATION RATE 256 KBPS AVAILABLE S/N	dB-Hz	54.1			
	REQUIRED Eb/No 10E-5 BER	dB dB	13.7 12.1			
	CODING GAIN	dB	4.4			
1	AVAILABLE SIGNAL MARGIN	dB	6.0			
	DATA CHANNEL (PCM/PSK/PM) (real tir	me)				
23	DATA/TOTAL POWER (MI=.5)	dB	-14.7			
	DATA POWER/KT	dBm/Hz/KT	55.2			
25	INFORMATION RATE (16 KBPS)	dB-Hz	42.1			
26	AVAILABLE S/N	dB	13.0			
	REQUIRED Eb/No 10E-5 BER	dB	12.1			
1	CODING GAIN	dB	4.4			
29	AVAILABLE SIGNAL MARGIN	dB	5.3			

Appendix 6, Flux Density; Narrowband Downlink

