

July 15, 2014

**BY ELECTRONIC FILING (IBES)**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Subject: Bond extension request, File No. SAT-MOD-20140321-00032, Call Sign S2912

Dear Ms. Dortch:

Planet Labs Inc. (“Planet Labs”), hereby requests a waiver to extend by 90 days the deadline to post a bond, as specified in Paragraph 8 in the *Planet Labs Mod*, released on June 18, 2014.<sup>1</sup> Under that paragraph, Planet Labs is required to post a bond of \$5,000,000 by July 18, 2014 to secure the launch and operation of all of the authorized Planet Labs satellites by June 18, 2020. The *Planet Labs Mod* authorized an additional 28 Earth Exploration Satellite Service (“EESS”) satellites operating in an altitude between 380 and 410 km, and an additional 11 EESS satellites operating in an altitude of 620 km. As the Commission is aware, 11 satellites (collectively known as “Flock 1c”) were launched into a 620 km orbit and brought into operation on June 19, 2014. In addition, the 28 satellites (collectively known as “Flock 1b”), were successfully launched on July 13, 2014 and are currently awaiting deployment from the International Space Station (“ISS”), which is scheduled to occur within 90 days of the bond posting deadline of July 18, 2014. Because the primary purpose of the bond (to secure launch and operation of the Planet Labs EESS satellites) is expected to be satisfied within such a short time period of the bond posting deadline, grant of the requested extension will not undermine the underlying purpose of the bond requirement and is consistent with Commission precedent.

**Background.** The Commission granted Planet Labs the above-referenced Modification with conditions on June 18, 2014. Paragraph 8 of the *Planet Labs Mod* Attachment to Grant requires that Planet Labs meets the following five satellite implementation milestones:

- Enter into a binding non-contingent contract to construct the licensed satellite system by June 18, 2015;
- Complete Critical Design Review by June 18, 2016;
- Begin construction of the first satellite by December 18, 2016;
- Launch and begin operation of the first satellite by December 18, 2017;
- Bring all of the authorized satellites into operation by June 18, 2020.

In addition, Paragraph 9 of the Attachment to Grant also mandates that Planet Labs file a \$5 million bond with the Commission within 30 days of the grant date, *i.e.* by July 18, 2014, pursuant to procedures established by the Commission.

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<sup>1</sup> See *Planet Labs Inc.*, Stamp Grant in File No. SAT-MOD-20140321-00032 (released June 18, 2014, “*Planet Labs Mod*”).

***Grant of an Extension is Warranted.*** As of July 13, 2014, all of the authorized Planet Labs satellites have been successfully launched, and presently the last 28 satellites are awaiting deployment from the ISS. Assuming no anomalies occur in the loading, scheduling and deployment of the satellites, Planet Labs expects the final 28 satellites to be deployed into the authorized orbit and brought into operation within 90 days of the bond posting deadline of July 18, 2014. A declaration attesting to these facts and the planned commencement of operations of the final 28 Planet Labs satellites is attached hereto as Annex 1.

Thus, Planet Labs will shortly be able to satisfy all 5 milestone requirements to commence operations of all the authorized Planet Labs satellites, rendering moot the need to submit a bond. Additionally, because the Planet Labs satellites have already been launched and are scheduled to begin service shortly, grant of the brief extension request would not undermine the underlying purposes of the bond requirement to “help deter speculative satellite applications and help expedite provision of service to the public.”<sup>2</sup> The Commission has granted similar extension requests in the past.<sup>3</sup> For the reasons set forth above, Planet Labs respectfully requests the FCC grant this request for a 90-day extension of the deadline to post a bond, as specified in the *Planet Labs Mod.*

If you require additional information, please contact the undersigned by telephone at (415) 829-3313, or by email at [mike@planet.com](mailto:mike@planet.com).

Sincerely,

**PLANET LABS INC.**

By:           s/ Michael Safyan            
Michael Safyan  
Regulatory Compliance  
Planet Labs Inc.

cc: Robert Nelson  
Karl Kensinger  
Stephen Duall  
Sankar Persaud

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<sup>2</sup> See *Amendment of the Commission’s Space Station Licensing Rules and Policies*, 18 FCC Rcd 10760, ¶ 167 (2003).

<sup>3</sup> See, e.g., Stamp Grant, New Skies Satellites B.V., Request for Extension of Time, File No. SAT-PPL-20110620-00112 (granted April 4, 2012); Stamp Grant, Intelsat North America LLC, Request for Extension of Time, File No. SAT-LOA-20100726-00167 (granted December 16, 2010).

**ANNEX 1**

**DECLARATION OF MICHAEL SAFYAN**

I, Michael Safyan, Regulatory Compliance, hereby certify under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:

All 11 Flock 1c satellites have been launched and brought into operation on June 19, 2014. All 28 Flock 1b satellites have been launched on July 13, 2014 and are currently awaiting deployment from the International Space Station (ISS). Deployment of all 28 Flock 1b satellites, assuming no anomalies occur in the loading, scheduling and deployment sequence, is expected to occur within 90 days of July 18, 2014.

Signed:

s/ Michael Safyan  
Michael Safyan  
Regulatory Compliance  
Planet Labs Inc.

July 15, 2014