

S2912 SAT-MOD-20150802-00053 IB2015001437
Planet Labs Inc.
FLOCK

** GRANT IN PART / DEFER IN PART **



File # SAT-MOD-20150802-00053

Call Sign S2912 Grant Date 06/15/16

(or other identifier)

Term Dates see

From 06/15/16

To: conditions

Approved:

Stephen J. Duall
Stephen J. Duall
Chief, Satellite Policy Branch

Approved by OMB
3060-0678

Date & Time Filed: Aug 2 2015 1:43:58:963PM
File Number: SAT-MOD-20150802-00053

*with conditions

FCC APPLICATION FOR SPACE AND EARTH STATION:MOD OR AMD – MAIN FORM	FCC Use Only
FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:

Flock Mod 3

1-8. Legal Name of Applicant			
Name:	Planet Labs Inc.	Phone Number:	415-829-3313
DBA Name:		Fax Number:	415-534-8992
Street:	346 9th St.	E-Mail:	mike@planet.com
City:	San Francisco	State:	CA
Country:	USA	Zipcode:	94103 -
Attention:	Michael Safyan		

Attachment to Grant
IBFS File No. SAT-MOD-20150802-00053
Call Sign S2912

The application of Planet Labs Inc. (Planet Labs), IBFS File No. SAT-MOD-20150802-00053, to modify its authorization to construct, deploy and operate a system of technically identical non-geostationary orbit (NGSO) Earth Exploration Satellite Service (EESS) satellites (Call Sign S2912), is GRANTED IN PART AND DEFERRED IN PART. Specifically, we defer action on Planet Labs' request to include in its authorization satellites that are the subject of a Petition to Deny by ORBCOMM.¹ We also defer action on transmissions of remote sensing and telemetry data to earth stations in the 8025-8400 MHz frequency band not listed in the table to condition 6 below. We otherwise grant Planet Labs' application. Planet Labs is authorized to construct, deploy, and operate up to 600 technically identical NGSO EESS satellites in addition to those satellites already deployed and currently operational.² The satellites will be deployed at altitudes between 350 km and 660 km and will transmit remote sensing and telemetry data to fixed earth stations in the 8025-8400 MHz (space-to-Earth) frequency band, receive command signals in the 2025-2110 MHz (Earth-to-space) frequency band, and may use the 401-402 MHz (space-to-earth) and 449.75-450.25 MHz (Earth-to-space) frequency bands for early-phase and emergency-backup telemetry, tracking, and command operations, as well as for ranging and orbit determination on a non-emergency basis throughout the mission lifetime. Operations under this grant of authority must be in accordance with the terms, conditions, and technical specifications set forth in Planet Lab's application and the Federal Communications Commission's rules, and are subject to the following conditions:

1. Planet Labs must prepare the necessary information, as may be required, for submission to the International Telecommunication Union (ITU) to initiate and complete the advance publication, coordination, due diligence, and notification process for these space stations, in accordance with the ITU Radio Regulations. Planet Labs shall be held responsible for all cost-recovery fees associated with ITU filings. No protection from interference caused by radio stations authorized by other administrations is guaranteed unless coordination and notification procedures are timely completed or, with respect to individual administrations, by successfully completing coordination agreements. Any radio station authorization for which coordination has not been completed may be subject to additional terms and conditions as

¹ The application was placed on Public Notice as accepted for filing on December 18, 2016. See *Policy Branch Information, Satellite Space Applications Accepted for Filing*, Public Notice, Report No. SAT- 01124 (IBFS File No. SAT-MOD-20160802-00053). On January 18, 2016, ORBCOMM License Corp. (ORBCOMM) filed a Petition to Dismiss, Deny or Hold in Abeyance certain portions of the Planet Labs application. ORBCOMM objected to Planet Lab's proposed operations using altitudes and orbital planes that would intersect with the authorized 47 degree-inclined 715 kilometer target operational orbits for its ORBCOMM Generation 2 satellites. ORBCOMM Petition at 1. The satellites authorized in this grant will be deployed at an altitude at or below 660 km. These orbital altitudes are not the subject of ORBCOMM's Petition and can be granted without prejudice to ORBCOMM's Petition.

² Planet Labs has previously been authorized to construct, deploy and operate satellites. See IBFS File Nos. SAT-LOA-20130626-00087 (granted December 3, 2013), SAT-MOD-20140321-00032 (granted June 18, 2014), and SAT-MOD-20140912-00100 (granted October 23, 2014). As of June 15, 2016, the satellites deployed and operational on orbit include 11 satellites that were deployed to a circular orbit at an initial altitude of 620 km (Flock 1c), 14 satellites deployed from the ISS (Flock 1e), 12 satellites deployed from the ISS (Flock 2b), and 24 satellites recently deployed from the ISS. (Flocks 2e and 2e'). Eight Flock 2e' satellites remain on ISS and are expected to be deployed soon.

Attachment to Grant
IBFS File No. SAT-MOD-20150802-00053
Call Sign S2912

required to effect coordination with the frequency assignments of other administrations. See 47 CFR § 25.111(b).

2. The number of simultaneously operational satellites must not exceed 200.
3. No more than 120 satellites may be deployed to orbits that exceed an altitude of 500 kilometers.
4. Deployment into an orbit with an inclination of 51.6 degrees, plus or minus 0.1 degree, at an altitude above the ISS, is not authorized by this grant.
5. Planet Labs shall tune TT&C UHF links to an agreed frequency range with NOAA as soon as possible to minimize interference to NOAA GOES Data Collection System (DCS), and radiosonde operations and continue to work closely with NOAA to identify and implement any further measures needed to avoid RFI to the systems mentioned earlier. This initial tuning would be an interim frequency range for Planet Labs to use for upcoming launches. For future mission planning, transition out of 401-406 MHz to avoid interference to DCS and radiosondes is recommended. Planet Labs and NOAA shall work jointly to explore future mitigation strategies to avoid interference to NOAA missions.
6. Transmissions of remote-sensing and telemetry data in the 8025-8400 MHz frequency band may only be made to and when within line of sight of the following earth stations:

Location
Maddock, ND (see condition 7 of this grant)
Brewster, WA
Goonhilly, United Kingdom
Chilbolton, United Kingdom
Awarua, New Zealand
Usingen, Germany
Ningi, Australia
Keflavik, Iceland (see condition 7 of this grant)

Transmissions to other earth station locations in the 8025-8400 MHz frequency band requires supplementing this modification application to include such additional earth station prior to

Attachment to Grant
IBFS File No. SAT-MOD-20150802-00053
Call Sign S2912

action on the deferred portion of this application, or modification of this license condition after action is taken on the deferred portion.

7. Planet Labs is not authorized to use the Maddock, ND, and Keflavik, Iceland, earth stations with newly launched Planet Labs satellites due to interference with operations of the LandSat satellites in the 8025-8400 MHz band until such time as a final agreement is reached on the necessary Memorandum of Agreement (MoA). Transmission to those earth stations will subsequently be subject to the terms and agreements of the MoA. The details (technical and otherwise) of such an arrangement need to be worked out between Planet Labs and three interested agencies (NASA, USGS, NOAA).

8. Power flux-density from operation in the 8025-8400 MHz band must not exceed the limits in No. 22.5 or Table 21-4 of the International Telecommunication Union's Radio Regulations or the limits in ITU-R Recommendation SA-1157.3.

9. Operations pursuant to this authorization must not cause harmful interference to stations operating in the 2025-2110 MHz band in accordance with the U.S. Table of Frequency Allocations. See 47 CFR § 2.106, Footnote US347.

10. Given the opportunity for additional entrants to operate in the 8025-8400 MHz band, we grant Planet Lab's request for waiver of the modified processing round requirements of 47 CFR §§ 25.156 and 25.157. See *DigitalGlobe, Inc.*, Order and Authorization, 20 FCC Red 15696 (Sat. Div., Int'l Bur. 2005), at paragraph 8.

11. Because Planet Labs must comply with technical requirements in Part 2 of the Commission's rules and the above-referenced power flux-density limits, which should prevent harmful interference to other operations in the band, we grant its request for a waiver of the default service rules in 47 CFR § 25.217(b). See *DigitalGlobe, Inc.*, *supra*, at paragraph 15.

12. This authorization will become null and void if, at any time during the license term, none of the 600 satellites hereby authorized is operating. This authorization may be subject to additional conditions, or a reduction in the number of authorized satellites, in the event future deployment rates do not justify an authorization for 200 operational satellites.

13. Planet Labs has fulfilled milestone and bond obligations imposed as conditions to a previous grant of authority to operate up to 28 NGSO satellites in the 8025-8400 MHz band. See IBFS File No. SAT-MOD-20140321-00032 (grant stamp dated June 18, 2014). Because of the need for Planet Labs to continuously replenish its satellite constellation within the duration of its license term, we will not impose additional milestones or bond conditions in connection with this license modification. We find that warehousing concerns are addressed in this situation through the imposition of condition 12 above.


14. Within 30 days after deployment of each satellite pursuant to this authorization, Planet Labs must file a notification with the Commission specifying its apogee and perigee altitudes and orbital inclination.

Attachment to Grant
IBFS File No. SAT-MOD-20150802-00053
Call Sign S2912

15. The authority granted herein is subject to the existing license term for operation under S2912, which ends February 28, 2029.

16. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 CFR § 0.261, and is effective immediately. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules, 47 CFR § § 1.106 and 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.

** GRANT IN PART / DEFER IN PART **

 GRANTED* International Bureau	File # <u>SAT-MOD-20150802-00053</u>
	Call Sign <u>S2912</u> Grant Date <u>06/15/16</u> (or other identifier)
	Term Dates see From <u>06/15/16</u> To: <u>conditions</u>
	Approved: <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch
	<i>*with conditions</i>

9-16. Name of Contact Representative

Name:	Michael Safyan	Phone Number:	415-829-3313
Company:	Planet Labs Inc.	Fax Number:	415-534-8992
Street:	346 9th St	E-Mail:	mike@planet.com
City:	San Francisco	State:	CA
Country:	USA	Zipcode:	94103-
Attention:	Michael Safyan	Relationship:	Engineer

CLASSIFICATION OF FILING

17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.

- a1. Earth Station
- a2. Space Station

- (N/A) b1. Application for License of New Station
- (N/A) b2. Application for Registration of New Domestic Receive-Only Station
- b3. Amendment to a Pending Application
- b4. Modification of License or Registration
- b5. Assignment of License or Registration
- b6. Transfer of Control of License or Registration
- b7. Notification of Minor Modification
- (N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite
- (N/A) b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States
- (N/A) b10. Other (Please specify)
- (N/A) b11. Application for Earth Station to Access a Non-U.S. satellite Not Currently Authorized to Provide the Proposed Service in the Proposed Frequencies in the United States
- (N/A) b12. Application for Database Entry
- b13. Amendment to a Pending Database Entry Application
- b14. Modification of Database Entry

17c. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
 Governmental Entity Noncommercial educational licensee
 Other (please explain):

17d.

Fee Classification CGW – Space Station Modification (Non-Geostationary)

18. If this filing is in reference to an existing station, enter:

(a) Call sign of station:
S2912

19. If this filing is an amendment to a pending application enter both fields, if this filing is a modification please enter only the file number:

(a) Date pending application was filed:

(b) File number:

SATMOD2014091200100

TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:

- a. Fixed Satellite
- b. Mobile Satellite
- c. Radiodetermination Satellite
- d. Earth Exploration Satellite
- e. Direct to Home Fixed Satellite
- f. Digital Audio Radio Service
- g. Other (please specify)

21. STATUS: Choose the button next to the applicable status. Choose only one.

- Common Carrier Non-Common Carrier

22. If earth station applicant, check all that apply.

- Using U.S. licensed satellites
 Using Non-U.S. licensed satellites

23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:

- Connected to a Public Switched Network Not connected to a Public Switched Network N/A

24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all applicable frequency band(s).

- a. C-Band (4/6 GHz) b. Ku-Band (12/14 GHz)
 c. Other (Please specify upper and lower frequencies in MHz.)

Frequency Lower: 401

Frequency Upper: 8400

(Please specify additional frequencies in an attachment)

TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- a. Fixed Earth Station
- b. Temporary-Fixed Earth Station
- c. 12/14 GHz VSAT Network
- d. Mobile Earth Station
- e. Geostationary Space Station
- f. Non-Geostationary Space Station
- g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY:

- Transmit/Receive Transmit-Only Receive-Only N/A

"For Space Station applications, select N/A."

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an 'X' in the box(es) next to all that apply.)

- a — authorization to add new emission designator and related service
- b — authorization to change emission designator and related service
- c — authorization to increase EIRP and EIRP density
- d — authorization to replace antenna
- e — authorization to add antenna
- f — authorization to relocate fixed station
- g — authorization to change frequency(ies)
- h — authorization to add frequency
- i — authorization to add Points of Communication (satellites & countries)
- j — authorization to change Points of Communication (satellites & countries)
- k — authorization for facilities for which environmental assessment and radiation hazard reporting is required
- l — authorization to change orbit location
- m — authorization to perform fleet management
- n — authorization to extend milestones
- o — Other (Please specify)

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments. Yes No

ALIEN OWNERSHIP Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30–34.

29. Is the applicant a foreign government or the representative of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No
30. Is the applicant an alien or the representative of an alien?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?

Yes No N/A

34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.

BASIC QUALIFICATIONS

35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules?
If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.

Yes No

36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.

Yes No

37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances.

Yes No

38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances

Yes No

39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.

Yes No

40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer. Exhibit 40

41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes.

Yes No

42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.

Yes No

42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Planet Labs Inc. requests modification of its authorization to operate a NGSO EESS space station license, Call Sign S2912, to maintain up to 200 satellites in Low Earth orbit over the next 10 years, which requires launch authorization of up to 600 technically identical satellites over the 10 year duration. The primary orbit of the satellites will be 475 km

Exhibit 43

43a. Geographic Service Rule Certification

By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.

A

By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.

B

By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached.

C

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing
Michael Safyan

46. Title of Person Signing
Director of Launch and Regulatory Affairs

—>

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PER, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

43. Description. (Summarize the nature of the application and the services to be provided).

Planet Labs Inc. requests modification of its authorization to operate a NGSO EESS space station license, Call Sign S2912, to maintain up to 200 satellites in Low Earth orbit over the next 10 years, which requires launch authorization of up to 600 technically identical satellites over the 10 year duration. The primary orbit of the satellites will be 475 km circular, SSO. See Exhibit 43 for additional information.