



May 2, 2018

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Subject: ITU Cost Recovery Declaration for the Skysat Satellite Network operating in
“Non-geostationary Orbit” in the “Non-planned” Frequency Bands (USASAT-30E)

Reference: FCC Application File No. SAT-MOD-20170317-00053; Callsign S2862

Dear Ms. Dortch,

Planet Labs Inc. (Planet) has acquired Terra Bella Technologies Inc. (formerly Skybox Imaging Inc.) and all of its assets, in particular the Skysat Satellite Network (call sign S2862), and is further detailed in File number SAT-T/C-20170215-00018. Planet is now the owner and operator of the Skysat Satellite network and requests the Commission to update the ITU with new contact information for all ITU correspondence and ITU cost-recovery matters for satellite network USASAT-30E. In particular we request to change the operating agency for the USASAT-30E system from Skybox Imaging Inc. (code 177) to Planet Labs Inc. (code 178).

Planet is aware that in accordance with Resolution 88 of the International Telecommunication Union’s (ITU) Plenipotentiary Conference (Marrakech, 2002), and ITU Council Decision 482, as modified, cost-recovery fees will apply to satellite network filings received by the Radiocommunications Bureau after November 7, 1998. As a consequence, Commission applicants are responsible for any and all fees charged by the ITU to process their satellite network filings. Planet hereby states that it is aware of this requirement and unconditionally accepts all cost recovery responsibilities associated with the ITU filings for the Skysat satellite network. Please address all cost-recovery inquires, and ITU correspondence and filings, related to the Skysat satellite network to the following point of contact. We understand that should there be any change in the point of contact information, we will inform the Commission within 30 days of the foreseen event.

Point of Contact Name: Craig Scheffler
Spectrum Manager

Organization Name: Planet Labs Inc.

Address: 645 Harrison St,
San Francisco, CA. 94107

E-Mail: craig@planet.com



Telephone Number: (720) 238-5634

Planet Labs Inc. understands that it must remit payment of any resultant cost-recovery fee to the ITU by the due date specified in the ITU invoice, unless an appeal filed prior to the due date is pending with the ITU. We fully understand that a license granted in reliance on such a commitment will be conditioned upon discharge of any such cost-recovery obligation. We also acknowledge that, in accordance with 47 C.F.R. §25.111, should we have an overdue ITU cost-recovery fee and have no appeal pending with the ITU, the Commission may dismiss any application associated with that satellite network.

Regards,

A handwritten signature in black ink, appearing to read "Richard B. Leshner".

Richard B. Leshner
Vice President, Regulatory and
Government Affairs
Planet Labs Inc.
rich@planet.com