



September 18, 2019

Via IBFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Erratum to Modification Application to add Globals 5-16
FCC File No. SAT-MOD-20190802-00070, Call sign S3032**

Dear Ms. Dortch:

BlackSky Global, LLC (“BlackSky”), hereby submits a correction to Exhibit 2 of the above referenced application to modify its application to add space stations to BlackSky’s constellation of satellites.

Exhibit 2 contains the legal narrative which identifies the specific frequencies on which Global 5-16 proposes to operate. Although identified correctly elsewhere and in Schedule S of its application, the S band operations should be identified as Earth to Space using the band 2025 – 2110 MHz. Attached hereto are corrected pages 5 and 9 to the narrative in Exhibit 2 with the corrected identification and frequencies.

Please contact the undersigned if you have any questions or need any additional information.

Sincerely,

/s/ _____
Kristina Hloptsidis
Director, Regulatory and Compliance

will be disabled during normal operations. BlackSky hopes that by adding this greater flexibility to its operation in this band it will facilitate coordination with NOAA.

Table 1 Showing Overall Frequencies Employed

Primary Payload Downlink:	(X-band)	8025-8400 MHz
Secondary TT&C Downlink:	(UHF)	401-402 MHz
Secondary TT&C Downlink (alt):	(UHF)	400-401 MHz
Primary TT&C Uplink	(S-band)	2025- <u>2110</u> MHz
Secondary TT&C Uplink:	(UHF)	449.75-450.25 MHz
GPS Receiver (receive-only):	(L-band)	1575.42 MHz

C. Orbit Information:

The BlackSky satellites need to operate in a range of orbits in order to achieve a high revisit rate. The exact orbits into which the satellites will be injected and later operated is also a function of the launch missions that will be available for the satellites. Each satellite has a predicted mission life of approximately three years. As a secondary customer on many launch missions, it is not practical long in advance for BlackSky to know exactly the exact parameters at which its satellites can be deployed. To allow BlackSky sufficient flexibility to accommodate these missions, BlackSky requests authorization for its Additional Satellites to be deployed anywhere from 385 to 600² kilometers in altitude and at inclinations anywhere from 35 degrees to 60 degrees.

²BlackSky notes that the operational altitude of the ISS is approximately 400 km. If BlackSky plans an orbital injection or will operate within the proximity of ISS, it will coordinate with NASA to assure protection of the ISS.

C. 2025-2110 MHz Band

Non-federal EESS (Earth to space) may operate in the 2025-2110 MHz band, subject to such conditions as may be applied on a case-by-case basis. Transmission to satellites operating in this band shall not cause harmful interference to federal and non-federal stations operating in accordance with the U.S. Table of Frequency Allocations.⁴ BlackSky will coordinate with federal and non-federal operators in this band to ensure compliance with this requirement.

D. 401-402 MHz Band

The 401-402 MHz band is allocated to several services, including Space Operation (space to Earth). BlackSky's proposed use of the frequencies in this band is consistent with this allocation.

BlackSky is committed to coordinating with federal and non-federal operators in this band as needed to avoid harmful interference. To increase BlackSky's flexibility in coordination, BlackSky has remapped the channels available in its UHF transceiver to provide more frequency options. A total of seven channels with transmission between 401.000 and 401.515 MHz may be used, with the particular channels to be employed to be determined through coordination.

E. 400-401 MHz Band

The 400-401MHz band is allocated to several services, including Space

⁴ See 47 C.F.R. § 2.106, note US 347.