



File # SAT-MOD-20190802-00070

Call Sign S3032 Grant Date May 27, 2020
(or other identifier)

Approved by OMB
3060-0678

Term Dates
From See Conditions To: See Conditions

Date & Time Filed: Aug 2 2019 2:12:55:613PM
File Number: SAT-MOD-20190802-00070

Approved: [Signature]
John W. [Signature]
John W. [Signature]
Satellite Policy Branch

* 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:
Global 5-16 mod 8-2

1-8. Legal Name of Applicant

Name:	BlackSky Global, LLC	Phone Number:	206-399-2325
DBA Name:		Fax Number:	
Street:	1505 Westlake Ave. North, Ste 600	E-Mail:	khloptsidis@SpaceflightIndustries.com
City:	Seattle	State:	WA
Country:	USA	Zipcode:	98109
Attention:	Ms Kristina Hloptsidis		

ATTACHMENT TO GRANT
BlackSky Global LLC
 IBFS File No. SAT-MOD-20190802-00070

IBFS File No(s):	SAT-MOD-20190802-00070 ¹	GRANT – With Conditions  International Bureau Satellite Division
Licensee/Grantee:	BlackSky Global LLC (BlackSky)	
Call Sign:	S3032	
Satellite Name:	Global-1 through Global-16	
Orbital Location: (required station-keeping tolerance)	Non-Geostationary Orbit (NGSO) (see scope of grant below)	
Administration:	United States of America	
Nature of Service:	Earth Exploration Satellite Service (EESS)	
Scope of Grant:	Modification of authority to construct, deploy, and operate a non-geostationary orbit Earth Exploration Satellite Service constellation to include 12 additional satellites (Global-5 through Global-16), operating at orbital altitudes ranging from 385 km to 600 km and with inclinations ranging from 35 degrees to 60 degrees, and utilizing additional secondary downlink TT&C frequencies at 401.4375 MHz, 401.225 MHz, 401.155 MHz, 401.085 MHz, 401.015 MHz and/or 400.875 MHz.	
Previous Grant(s)	Authority to construct, deploy, and operate a constellation of up to 4 technically identical NGSO space stations, initially deployed to orbital apogee altitudes ranging from 460 km to 585 km and with inclinations ranging from 42 degrees to polar sun-synchronous (nominal 98 degrees).² Modification of authority to include: (i) a change in the propulsion system to be employed for Global-4 from a butane-based to water-based system; and (ii) to modify the lower end of the altitude range, to specify 435 km instead of 460 km.³	
Service Area(s):	Global. See Schedule S Tech Report and associated antenna gain contours.	
Frequencies:	8025-8400 MHz (space-to-Earth) (remote sensing data) 1575.42 MHz (GPS) (receive) Telemetry, Tracking, and Command (TT&C) frequencies: 2025-2110 MHz (Earth-to-space) (primary⁴ TT&C uplink) 8025-8400 MHz (space-to-Earth) (primary TT&C downlink) 401.5 MHz, 401.4375 MHz, 401.375 MHz, 401.225 MHz, 401.155 MHz, 401.085 MHz,	

¹ The application was placed on Public Notice as accepted for filing on September 13, 2019. See *Policy Branch Information, Applications Accepted for Filing*, Public Notice, Report No. SAT-01412 (IBFS File No. SAT-MOD-20190802-00070).

² IBFS File No. SAT-LOA-20180320-00023. Pursuant to this authorization, Global-1 operates at a mean altitude of 487 km with an inclination of 97.49 degrees, and Global-2 operates at a mean altitude of 581 km with an inclination of 97.76 degrees. Letter from Kristina Hloptsidis, Director of Regulatory and Compliance, to Marlene H. Dortch, Secretary, FCC, in IBFS File No. SAT-LOA-20180320-00023 (filed Dec. 28, 2018) (*December 28 Letter*).

³ See *Policy Branch Information, Applications Accepted for Filing*, Public Notice, Report No. SAT-01379 (IBFS File No. SAT-MOD-20190314-00015).

⁴ The primary means for communication of space operations data concerning the satellites is to use the 2025-2110 and 8025-8400 MHz bands, typically together with operations necessary for downlinking remote sensing data. The UHF frequencies provide a secondary means for such operations. Both primary and secondary TT&C links can be used for “normal” operations, i.e., routine TT&C.

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	401.015 MHz and/or 400.875 MHz (space-to-Earth) (secondary TT&C downlink) 449.75-450.25 MHz (Earth-to-space) (secondary TT&C uplink) (center carrier frequency at 450.2 MHz)
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Operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner and with Federal Communication Commission's rules not waived herein. This grant is also subject to the following conditions:

1. BlackSky 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. BlackSky 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 required to effect coordination with the frequency assignments of other administrations. *See* 47 CFR § 25.111(b).
2. BlackSky must coordinate physical operations of spacecraft with any operator using similar orbits, for the purpose of eliminating collision risk and minimizing operational impacts. The orbital parameters specified in this grant are subject to change based on such coordination.
3. Upon receipt of a conjunction warning from the JSpOC or other source, BlackSky must review the warning and take all possible steps to assess and, if necessary, to mitigate collision risk, including, but not limited to: contacting the operator of any active spacecraft involved in such warning; sharing ephemeris data and other appropriate operational information with any such operator; modifying spacecraft attitude and/or operations.
4. BlackSky shall tune TT&C UHF links to 401.5 MHz, 401.4375 MHz, 401.375 MHz, 401.225 MHz, 401.155 MHz, 401.085 MHz, 401.015 MHz and/or 400.875 MHz as this represents the agreed transmit frequencies with the National Oceanic and Atmospheric Administration (NOAA) 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 NOAA systems mentioned earlier. For future mission planning, BlackSky shall transition out of 401-406 MHz to avoid interference to DCS and radiosondes. It is recommended this transition occur by October 31, 2023, unless BlackSky certifies that it has completed a coordination agreement with DOC/NOAA for operations in these UHF frequencies above. BlackSky and NOAA shall work jointly to explore future other mitigation strategies to avoid interference to NOAA missions.
5. BlackSky Global satellite constellation (Global 5-16 and replacement satellites for Global 1-4) operating under normal TT&C downlink, must only operate two satellites per frequency (using the frequencies 400.875 MHz, 401.155 MHz, 401.225 MHz, and/or 401.375 MHz) and only operate one satellite per frequency (using the frequencies 401.015 MHz, 401.085 MHz, 401.4375 MHz, and/or 401.5 MHz), at a 5% transmit duty cycle for any of the satellites addressed in this condition. This condition may be modified through a completed coordination agreement with DOC/NOAA.
6. Satellites in the BlackSky Global satellite constellation (Global 5-16 and replacement satellites for Global 1-4) not going through LEOP or an anomaly event, but operating normal TT&C downlink during a LEOP/anomaly event lasting up to 10 days, that uses the following frequencies:
 - 400.875 MHz, 401.155 MHz, 401.225 MHz, and/or 401.375 MHz,
 - 401.0-401.1 MHz and/or 401.4-401.515 MHz frequency range

must only operate one satellite per frequency (or frequency range, where applicable) at a 3% transmit duty cycle

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for the duration of the LEOP/anomaly event for any of the satellites addressed in this condition. Following the end of the LEOP/anomaly event, BlackSky shall only operate normal TT&C downlinks on two satellites per frequency (or frequency range, where applicable) at a 3% transmit duty cycle, for a duration of 30 days after the start of the LEOP/anomaly event for any of the satellites addressed in this condition. Beacons on a satellite going through a LEOP/anomaly event may use any licensed frequency, but when the BlackSky Global satellite constellation will operate beacon transmissions using frequencies in the range 401.0-401.1 MHz and/or 401.4-401.515 MHz, BlackSky shall use only one frequency in each range and it must be limited to only one satellite beacon per frequency range. This condition may be modified through a completed coordination agreement with DOC/NOAA.⁵

7. Operations (Global 5-16 and replacement satellites for Global 1-4) in the 400.15-402 MHz (space-to-Earth) frequency band are limited to TT&C and BlackSky shall not exceed the long term interference criteria limits specified in Table 2 (Type C) of Recommendation ITU-R RS.1263-2 in order to protect NOAA radiosondes operations in the United States and Possessions.
8. Operations in the 449.75-450.25 MHz (Earth-to-space) frequency band are limited to telecommand and must be consistent with footnote US87 to the U.S. Table of Frequency Allocations, 47 CFR § 2.106. BlackSky must take all practical steps to keep the telecommand carrier frequency close to 450 MHz.
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. Transmissions of remote-sensing data in the 8025-8400 MHz frequency band may only be made to earth stations coordinated with the National Aeronautics and Space Administration (NASA). BlackSky shall provide the FCC with an updated list of coordinated earth stations within ten business days following any changes to that list.⁶
11. Power flux-density from operation in the 8025-8400 MHz band must not exceed the limits in No. 22.5 and Table 21-4 of the International Telecommunication Union's Radio Regulations, the limits/protection criteria in Recommendation ITU-R SA.1157-1 must be met, and the guidelines in Recommendation ITU-R SA.1810 must be followed.
12. Given the opportunity for additional entrants to operate in the 8025-8400 MHz band, we grant BlackSky'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.
13. Because BlackSky 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.
14. BlackSky's request for a waiver of section 25.114(c) of the Commission's rules, 47 CFR § 25.114(c), to the extent described in its application with respect to certain information to be provided in the Schedule S for Global-3, IS GRANTED. We find that a waiver is warranted for the requirement for orbital information on the Schedule S for Global-5-Global-16 because the unique circumstances BlackSky detailed in its Narrative are sufficient good cause for waiver.
15. BlackSky must launch the remaining space stations necessary to complete its authorized service

⁵ During the early stages of LEOP for Global 7 and Global 8, BlackSky may operate beacon transmissions from these two satellites within the frequency range 401.4 – 401.515 MHz. This does not imply that a similar request for future launches will be granted.

⁶ A list of earth stations already coordinated with federal agencies is attached as Appendix A to this grant.

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constellation, place them in their assigned orbits, and operate them in accordance with the authorization no later than October 3, 2027.⁷

16. Prior to commencing operations with the space stations authorized herein, BlackSky must file with the Commission the information required by section 25.172 of the Commission's rules, 47 CFR § 25.172.

17. Before commencing operations of any satellites in its constellation at orbital altitudes from 385 km to 400 km, BlackSky must obtain the necessary authority from NOAA for remote-sensing operations at these altitudes.⁸

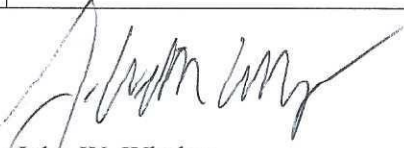
18. Within 30 days after launching each satellite authorized herein, BlackSky must file a notification with the Commission specifying the satellite's orbital altitude and inclination.

19. The license term expires on December 28, 2033.

Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned.

This action is taken pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 CFR § 0.261, and is effective upon release.

Station licenses are subject to the conditions specified in Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(h).

Action Date:	May 27, 2020	
Term Dates	From: see conditions	To: see conditions
Approved:  John W. Whaley Acting Chief, Satellite Policy Branch		

⁷ BlackSky's authorization was originally subject to milestone and bond conditions, but BlackSky subsequently informed that that Global-1, Global-2 were launched, deployed, and in operation pursuant to the initial license and thus satisfied the milestone and bond conditions, with the exception of the requirement to deploy and operate the remaining two satellites in its proposed constellation by October 3, 2027. *See December 28 Letter.*

⁸ Although we authorize BlackSky to operate at orbital altitudes from 385 km to 600 km as requested in BlackSky's application, BlackSky's informs that its remote sensing license issued by NOAA is limited to orbital altitudes from 400 km to 600 km. *See Letter from Jonathon L. Wiener, Attorney, BlackSky Global LLC, to Marlene H. Dortch, Secretary, FCC, IBFS File No. MOD-20190802-00070 (filed Oct. 24, 20189).* BlackSky notes that it will seek and receive additional NOAA authority before operating between 385 and 400 km.

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APPENDIX A:
BlackSky Earth Stations
Coordinated With Federal Agencies

Name	Location	Site Elevation (meters AMSL)	Latitude (N)	Longitude (E)
Guam (E190037)	Birandan Anakko 168 Dededo, Guam, GU, 96929	72	13° 30' 48.8" N	144° 49' 31.1" E
Fairbanks (WJ2XHL)	1625 Richardson Highway, North Pole, AK 99705, USA	144	64° 47' 38" N	147° 32' 09" W
Svalbard	Svalbard Satellite Services, SvalSat Platåberget, PB 458 9171 Longyearbyen, NORWAY	450	78° 13' 45" N	015° 23' 42" E
Usingen	Erdfunkstelle 1 61250 Usingen, GERMANY	383	50° 19' 51" N	008° 28' 16" E
Invercargill	781 Colyer Road, Awarua Plains 9877, NEW ZEALAND	24	46° 31' 43" S	168° 22' 52" E
Chitose	066 - 0051 Hokkaido Chitose-shi Izumizawa 1007-199 JAPAN	71	42°46'28"N	141°37'28"E
Westminster	1300 W 120th Ave, Westminster, CO 80234	1655	39°54'44"N 104°59'58"W	104°59'58"W
Aurora	750 S Richfield St, Aurora, CO 80016	1669	39°42'15"N,	104°47'02"W
Grafenwöhr	MWXJ+G2 Grafenwöhr, Germany	1423	49° 41' 56" N	11° 55' 48" E

9-16. Name of Contact Representative

Name:	Jonathan L. Wiener	Phone Number:	703-216-9224
Company:	Goldberg, Godles, Wiener & Wright LLP	Fax Number:	
Street:	1025 Connecticut Ave, NW Ste 1000	E-Mail:	jwiener@g2w2.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20036-
Attention:		Relationship:	Legal Counsel

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: S3032	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: SATMOD2019031400015
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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?

☐ Yes ☒ No

30. Is the applicant an alien or the representative of an alien?

☐ Yes ☐ No ☒ N/A

31. Is the applicant a corporation organized under the laws of any foreign government?

☐ Yes ☐ No ☒ N/A

32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned 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?

☐ Yes ☐ No ☒ 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 1

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.) Applicant seeks to modify its small-sat non-geostationary orbit Earth Exploration Satellite Service system by adding additional space stations to the constellation. See Exhibit 2 hereto. Exhibit 2	

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
Nick Merski

46. Title of Person Signing
VP, Space Operations

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).

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