



File # SAT-MOD-20200615-00076

Call Sign S2912 Grant Date March 18, 2021
(or other identifier)

Approved by OMB
3060-0678

Term Dates
From March 22, 2021 To: February 28, 2029

Approved: Merissa L. Velez
Merissa L. Velez
Chief, Satellite Policy Branch.

Date & Time Filed: Jun 15 2020 2:11:29:106PM
File Number: SAT-MOD-20200615-00076

*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:
Consolidation of Flock and SkySat Licenses

1-8. Legal Name of Applicant			
Name:	Planet Labs Inc.	Phone Number:	415-829-3313
DBA Name:		Fax Number:	
Street:	645 Harrison Street	E-Mail:	mike@planet.com
City:	San Francisco	State:	CA
Country:	USA	Zipcode:	94107 -
Attention:	Mike Safyan		

ATTACHMENT TO GRANT

Planet Labs Inc.

IBFS File No. SAT-MOD-20200615-00076

IBFS File No(s):	SAT-MOD-20200615-00076	<p>GRANTED- With Conditions</p>  <p>International Bureau Satellite Division</p>
Licensee/Grantee:	Planet Labs Inc.	
Call Sign:	S2912 ¹	
Satellite Name:	Flock/SkySat constellation	
Orbital Location: (required station-keeping tolerance)	NGSO at altitudes between 350 km and 720 km (Flock); NGSO at altitudes between 400 km and 630 km and inclinations between 85 and 100 degrees (SkySat 1 and 2); 97.0 and 97.9 degrees (SkySat 3-21); approximately 400 km to 420 km between 40.0 and 60.0 degrees (SkySat 16-21 alternative orbit)	
Administration:	United States of America	
Nature of Service:	Earth Exploration Satellite Service; Space Operations	
Scope of Grant:	Consolidation of the SkySat satellites (Call Sign S2862) and the Flock satellites (Call Sign S2912) under one satellite system license (Call Sign S2912).	
Previous Grant(s):	<p>Authority to construct, deploy, and operate a constellation of up to 544 technically identical non-geostationary satellites as follows:²</p> <ul style="list-style-type: none"> • 12 Flock 2p satellites deployed at 505 km with an inclination of 97.51° by the PSLV launch vehicle; • 529 satellites initially deployed to orbital apogee altitudes of no greater than 660 kilometers, including up to 3 satellites with an Automatic Identification System (AIS) receiver system to demonstrate the capability of the satellites receive AIS 1 (161.9625 MHz-161.9875 MHz) and AIS 2 (162.0125-162.0375 MHz) channels; • 3 satellites for purposes of a propulsion demonstration, deployed to orbital apogee altitudes of approximately 550 kilometers. <i>See</i> IBFS File No. SAT-MOD-20170713-00103 (granted Jul. 19, 2018). <p>Authority to allow no more than 120 satellites to be deployed to orbits that exceed an apogee altitude of 550 kilometers, rather than 500 kilometers.³</p> <p>Authority to construct, deploy and operate two satellites, SkySat-1 and SkySat-2, in high-inclination circular orbits. <i>See</i> IBFS File No. SAT-LOA-20120322-00058 (granted Sept. 20, 2012).</p>	

¹ *See Policy Branch Information, Applications Accepted for Filing, Public Notice, Report No. SAT-01482 (July 17, 2020).* This grant consolidates under one satellite system license (Call Sign S2912) the SkySat satellites (Call Sign S2862) and the Flock satellites (Call Sign S2912). *See* IBFS File No. SAT-MOD-20191217-00148 (Call Sign S2862) (granted Mar. 16, 2020) and IBFS File No. SAT-MOD-20170713-00103 (Call Sign S2912) (granted Jul. 19, 2018). It does not include any technical changes to Planet Lab's authorizations, although we make minor editorial revisions to some conditions

² *See* IBFS File Nos. SAT-MOD-20170713-00103 (granted in part, deferred in part May 24, 2018); SAT-AMD-20171106-00151 (granted May 24, 2018); SAT-AMD-20171025-00144 (granted Dec. 8, 2017); SAT-MOD-20150802-00053 (granted in part, deferred in part Sept. 15, 2016; granted in part, deferred in part Dec. 8, 2017); SAT-MOD-20140912-00100 (granted Oct. 23, 2014); SAT-MOD-20140321-00032 (granted June 18, 2014); SAT-LOA-20130626-00087 (granted Dec. 3, 2013).

³ *See* IBFS File No. SAT-MOD-20170713-00103 (granted in part, deferred in part May 24, 2018) (noting also that the total number of simultaneously operational satellites refers specifically to those satellites providing EESS and does not include non-operational satellites that continue to operate in TT&C frequency bands as part of approved post-mission disposal plans).

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	<p>Authority to construct, deploy, and operate SkySat-3. <i>See</i> IBFS File No. SAT-MOD-20150408-00019 (granted in part and deferred in part June 10, 2016).</p> <p>Authority to construct, deploy and operate 12 additional satellites, SkySat-4 through SkySat-15, in circular orbits with altitudes from 400 to 630 km, depending on the launch vehicle used, and with inclination ranging between 97 and 97.9 degrees. <i>See</i> IBFS File No. SAT-MOD-20150408-00019 (granted Aug. 31, 2016).</p> <p>Authorization to deploy and operate up to six additional non-geostationary orbit remote-sensing satellites, SkySat-16 through SkySat-21, in circular orbits with altitudes from 400 to 630 km, depending on the launch vehicle used, and with inclination ranging between 97 and 97.9 degrees. <i>See</i> IBFS File No. SAT-MOD-20170317-00053 (granted June 29, 2017).</p> <p>Modification of the specified operational orbital altitude range for SkySat-16 and SkySat-21 satellites to include the inclination range of 40.0 to 60.0 degrees in addition to the inclination range of 97.0 degrees and 97.9 degrees. Modification of the specified operational orbital range for SkySat-3 to include altitudes down to 400 km. <i>See</i> IBFS File No. SAT-MOD-20191217-00148 (granted March 16, 2020).</p>
Service Area(s):	Global. <i>See</i> Schedule S Tech Report at Item S6 (SAT-MOD-20170713-00103); Schedule S Tech Report and Exhibit 43 at 39-74 (SAT-MOD-20191217-00148).
Frequencies:	<p>8025-8400 (space-to-Earth) (remote sensing data and telemetry) 2025-2110 MHz (Earth-to-space) (command)</p> <p>401-402 MHz (space-to-Earth) and 449.75-450.25 MHz (Earth-to-space) (early-phase and emergency-backup, as well as ranging and orbit determination on a non-emergency basis) (Flock satellites only)</p> <p>161.9625-161.9875 MHz (AIS 1) and 162.0125-162.0375 MHz (AIS 2) (up to 3 demonstration satellites) (Flock satellites only)</p>
<p>Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner and with the Federal Communications Commission's rules not waived herein. This grant is also subject to the following conditions:</p> <ol style="list-style-type: none">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 required to effect coordination with the frequency assignments of other administrations. <i>See</i> 47 CFR § 25.111(b).Operations pursuant to this authorization must be in compliance with the terms of the Memoranda of Agreement between Planet Labs and the National Aeronautics and Space Administration (NASA) pertaining to operations in the frequency band 8025-8400 MHz.⁴ Transmissions of remote-sensing and telemetry data in the	

⁴ This includes, for the Flock satellites, transmissions in the 8025-8400 MHz band to the Maddock, ND, and Keflavik, Iceland, earth stations. *See* IBFS File No. SAT-MOD-20170713-00103, grant in part May 24, 2018, at para. 8.

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8025-8400 MHz frequency band may only be made to earth stations coordinated with the National Aeronautics and Space Administration (NASA).⁵ Planet shall provide the FCC with a list of coordinated earth stations, and shall provide the FCC with an updated list within ten business days following any changes to the list.

3. 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.

4. 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.

5. Planet Labs shall tune Flock satellite 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. Upon receipt of a conjunction warning from the JSPOC or other source for Flock satellites, Planet Labs 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.

7. The number of simultaneously operational Flock satellites must not exceed 200.⁶

8. No more than 120 Flock satellites may be deployed to orbits that exceed an apogee altitude of 550 kilometers.

9. Deployment of a Flock satellite 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.

10. Given that there is little potential for interference into any authorized service, we grant, on our own motion, a waiver of the U.S. Table of Frequency Allocations, 47 CFR § 2.106, to allow non-conforming use of the 2025-2110 MHz band and the 8025-8400 MHz band in support of Planet Labs' limited demonstration of propulsion technology, subject to the condition that Planet Labs accepts any interference from authorized services in these bands in connection with its limited propulsion demonstration and that transmissions in the 8025-8400

⁵ Planet Labs has executed written coordination agreements with NASA, which include identification of the earth stations with which Planet Labs may communicate in the 8025-8400 MHz band and specification of a process by which to remove and add earth stations. *See* IBFS File No. SAT-MOD-20170713-00103, Narrative Exhibit 43 at 1. Planet Labs has filed a list of coordinated earth stations for the Flock satellites with the Commission in accordance with a condition on the Flock satellite authorization. *See* Letter from Craig Scheffler, Spectrum Manager, Planet Labs, Inc. to Marlene H. Dortch, Secretary, FCC (filed Aug. 1, 2018 in IBFS File No. SAT-MOD-20170713-00103); *see also* IBFS File No. SAT-MOD-20170713-00103, Narrative Exhibit 43 at 1. The SkySat satellite authorization also included a similar condition, although without a requiring that the list be filed with the Commission. *See* SAT-MOD-20191217-00148, grant at para. 5. In consolidating the licenses, we apply the version of the condition from the Flock satellite grant to both the Flock and SkySat satellites, with minor editorial changes, including a clarification regarding when the list of coordinated earth stations must be updated with the Commission. *See* Planet Labs Application to Consolidate Licenses, Exhibit 43 and A at iii, para. 5 (list of Planet Labs' proposed consolidated license conditions).

⁶ The total number of simultaneously operational Flock satellites refers specifically to those satellites providing EESS and does not include satellites that continue to operate in TT&C frequency bands as part of an approved post-mission disposal plan.

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MHz band are subject to the agreement regarding the Flock satellites reached between Planet Labs and NASA in this band.⁷

11. 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.*

12. 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 12.*

13. This authorization will become null and void regarding Flock satellites if, at any time during the license term, there are no Flock satellites operating; or with regard to SkySat satellites, if there are no SkySat satellites operating. This authorization may be subject to additional conditions, or a reduction in the number of authorized Flock satellites, in the event future deployment rates do not justify an authorization for 200 operational satellites.

14. Planet Labs has fulfilled milestone and bond obligations imposed as conditions to a previous grant of authority to operate up to 28 NGSO Flock satellites in the 8025-8400 MHz band. *See IBFS File No. SAT-MOD-20140321-00032 (grant stamp dated June 18, 2014), as well as a previous grant of authority for SkySat to operate the SkySat-3 satellite in the 2020-2025 MHz band (see IBFS File No. SAT-MOD20150408-00019).* Because of the need for Planet Labs to continuously replenish its Flock satellite constellation within the duration of its license term, and the discharge of the bond requirement associated with the previous SkySat grant, 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 14 above.

15. 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.

16. The term of this license ends February 28, 2029.

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 C.F.R. § 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:	March 18, 2021	
Term Dates	From: March 22, 2021	To: February 28, 2029

Approved:



Merissa L. Velez
 Chief, Satellite Policy Branch

⁷ See Condition 2.

9-16. Name of Contact Representative

Name:	Tony Lin	Phone Number:	2026375795
Company:	Hogan Lovells US LLP	Fax Number:	2026375910
Street:	555 113th Street, NW	E-Mail:	tony.lin@hoganlovells.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20004-
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

<p>17c. Is a fee submitted with this application?</p> <p><input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R.Section 1.1114).</p> <p><input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee</p> <p><input type="radio"/> Other(please explain):</p>	
<p>17d.</p> <p>Fee Classification CGW – Space Station Modification(Non–Geostationary)</p>	
<p>18. If this filing is in reference to an existing station, enter:</p> <p>(a) Call sign of station: S2912</p>	<p>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:</p> <p>(a) Date pending application was filed:</p> <p>(b) File number: SATMOD2017071300103</p>

TYPE OF SERVICE

<p>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:</p> <p><input type="checkbox"/> a. Fixed Satellite <input type="checkbox"/> b. Mobile Satellite <input type="checkbox"/> c. Radiodetermination Satellite <input checked="" type="checkbox"/> d. Earth Exploration Satellite <input type="checkbox"/> e. Direct to Home Fixed Satellite <input type="checkbox"/> f. Digital Audio Radio Service <input type="checkbox"/> g. Other (please specify)</p>	
<p>21. STATUS: Choose the button next to the applicable status. Choose only one.</p> <p><input checked="" type="radio"/> Common Carrier <input checked="" type="radio"/> Non-Common Carrier</p>	<p>22. If earth station applicant, check all that apply.</p> <p><input type="checkbox"/> Using U.S. licensed satellites <input type="checkbox"/> Using Non-U.S. licensed satellites</p>
<p>23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:</p> <p><input checked="" type="radio"/> Connected to a Public Switched Network <input checked="" type="radio"/> Not connected to a Public Switched Network <input checked="" type="radio"/> N/A</p>	
<p>24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all applicable frequency band(s).</p> <p><input type="checkbox"/> a. C-Band (4/6 GHz) <input type="checkbox"/> b. Ku-Band (12/14 GHz) <input checked="" type="checkbox"/> c. Other (Please specify upper and lower frequencies in MHz.) Frequency Lower: 2025 Frequency Upper: 8400 (Please specify additional frequencies in an attachment)</p>	

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 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? 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 40 Ownership

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?N/A

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 seeks Commission consent for the proposed space station license pro forma modification and consolidation of space station licenses. See attachment Exhibit 43 and A for detailed narrative and proposed consolidated license.

Exhibit 43 and A

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
Adonica Wada

46. Title of Person Signing
Vice President, Regulatory Affairs & Compliance

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**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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