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Planet Labs PBC

ICFS File Nos. SAT-MOD-20231031-00269; SAT-AMD-20250130-00033; SAT-AMD-20231127-00290; SAT-MOD-20220421-00042; SAT-MOD-20240723-00157; SAT-MOD-20250527-00129

ICFS File No(s):	SAT-MOD-20231031-00269; SAT-AMD-20250130-00033; ¹ SAT-AMD-20231127-00290; ² SAT-MOD-20220421-00042; ³ SAT-MOD-20240723-00157; ⁴ SAT-MOD-20250527-00129 ⁵	GRANTED⁶ & GRANTED-IN-PART/ DEFERRED IN PART⁷ With Conditions  Satellite Programs and Policy Division Space Bureau
Licensee/Grantee:	Planet Labs PBC	
Call Sign:	S2912	
Satellite Name:	Flock/SkySat/Pelican constellations	
Orbital Location: (required station-keeping tolerance)	Flock: Non-geostationary satellite orbit (NGSO) at altitudes between 350 km and 720 km. SkySat: NGSO with SkySat 1 and 2 at altitudes between 450-637 km and inclinations between 85 and 100 degrees, SkySat 3-15 at altitudes below 630 km and inclination between 97.0 and 97.9 degrees, SkySat 16-18 at altitudes below approximately 450 km and inclination of 53.0 degrees, SkySat 19 at altitudes below approximately 425 km and inclination of 53.0 degrees, SkySat 20-21 at altitudes below approximately 420 km and inclination of 53.0 degrees,⁸ SkySat 3-21 at altitudes 400 km and 630 km and inclinations between 97.0 and 97.9 degrees, and SkySat 16-21 alternative orbit approximately 400 km to 420 km and inclinations between 40.0 and 60.0 degrees.	

¹ *Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Accepted for Filing*, Public Notice, Report No. SAT-01895 (Feb. 21, 2025).

² *See Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Actions Taken*, DA No. 24-1280, Public Notice, Report No. SAT- 01881 (Dec. 20, 2024) (ICFS File Nos. SAT-MOD-20231013-00269; SAT-AMD-20231127-00290) (granted in part).

³ *See Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Actions Taken*, DA 23-911, Public Notice, Report No. SAT-01762 (Sept. 29, 2023) (ICFS File No. SAT-MOD-20220421-00042) (granted in part Sept. 1, 2023; reissued Sept. 29, 2023).

⁴ *See Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Actions Taken*, DA 24-1177, Public Notice, SAT-Report No. 01874 (granted Nov. 21, 2024, and reissued on July 10, 2025 to correct that the action taken was a grant in part/deferral in part).

⁵ *See Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Accepted for Filing*, Public Notice, SAT-Report No. 01936 (July 25, 2025). *See also* Letter from Danielle J. Piñeres, Deputy General Counsel & Vice President of Regulatory Affairs & Policy, Planet Labs PBC. to Marlene H. Dortch, Secretary, FCC, ICFS File No. SAT-MOD-20250527-00129 (July 7, 2025) (Planet Supplemental Filing).

⁶ ICFS File Nos. SAT-MOD-20231013-00269; SAT-AMD-20250130-00033; SAT-AMD-20231127-00290; SAT-MOD-20220421-00042; and SAT-MOD-20240723-00157 are granted.

⁷ ICFS File No. SAT-MOD-20250527-00129 is granted in part and deferred in part. We defer Planet's request for authorization for the use of an L-band radio terminal for inter-satellite links (ISLs) on Pelican satellites 5-10, as an end user of the Inmarsat system.

⁸ Planet states that the SkySat satellite orbits will not be perfectly circular. *See* ICFS File No. SAT-MOD-20230224-00040, Exh. B at 3, n.10. However, the orbital altitudes will be within the ranges specified.

GRANT

Planet Labs PBC

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	Pelican 1: NGSO, deployed to and commissioning at altitudes between 250 km and 550 km, with operations in sun-synchronous orbits at altitudes of 325 km (± 25 km), and inclinations of 96.7 degrees (for Pelicans 1-10); ⁹ Pelicans 2-10: NGSO, deployed to and commissioning at 535 km, with operations at altitudes of 440 km (± 25 km) in either in sun-synchronous orbits or 53 degrees (± 2 degrees) for up to six of the first ten Pelicans; ¹⁰ and 325 km (± 25 km), and inclination of 53 degrees (for Pelicans 11-24). ¹¹	
Administration:	United States of America	
Nature of Service:	Earth Exploration Satellite Service (EESS)	
Scope of Grant:	Authority to: (1) increase the total number of Flock satellites authorized to be deployed and operated from 544 to 744, with the additional 200 satellites operating at altitudes no higher than 550 km; ¹² (2) transmit inter-satellite links in the 6225-6425 MHz band using Pelican satellites to communicate with SES GSO satellites; ¹³ (3) increase the number of Pelican satellites authorized to be deployed and operated under the current first-generation design from 7 to 24 satellites; ¹⁴ (4) authorize Pelican satellites 2-10 to operate at a 440 km nominal altitude (± 25 km) and Pelican satellites 3-10 to be inserted at altitudes up to 535 km; and (5) authorize up to six of the first ten Pelican satellites to operate either in sun-synchronous orbit (SSO) or at an inclination of 53 degrees (± 2 degrees).	
Previous Grant(s):	Authority to construct, deploy, and operate a constellation of up to 544 technically identical non-geostationary satellites as follows: ¹⁵	

⁹ See ICFS File No. SAT-MOD-20231031-00269.

¹⁰ See ICFS File No. SAT-MOD-20250527-00129.

¹¹ See ICFS File No. SAT-MOD-20220421-00042, Attachment Ex. C Tech Appendix, at 1.

¹² 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 ICFS 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 for the Flock satellites. We find that warehousing concerns are addressed in this situation given the opportunity for additional entrants to operate in the same frequencies.

¹³ Planet's Pelican satellites would communicate with certain non-U.S. licensed SES satellites operating in geostationary satellite orbit (GSO). See Letter from Daniel C.H. Mah, Vice President, Legal & Regulatory Affairs, New Skies Satellites B.V. (SES), to Marlene H. Dortch, Secretary, FCC (filed Feb. 1, 2023) in ICFS File No. SAT-MOD-20220421-00042). SES states that it has made arrangements with Planet for its Pelican constellation to communicate with the following SES C-band satellites, all of which are Netherlands licensed and have been granted U.S. market access: (1) NSS-9 at 177° W.L. (Call Sign S2756); (2) SES-4 at 22° W.L. (Call Sign S2828); and (3) SES-6 at 40.5° W.L. (Call Sign S2870). *Id.* Pelican will also communicate with another Netherlands-licensed SES spacecraft, NSS-12 at 57° E.L. *Id.*

¹⁴ See Letter from Danielle Piñeres, Planet Labs PBC, to Marlene H. Dortch, Secretary, FCC (Jun. 17, 2025) in ICFS File No. SAT-MOD-20220421-00042 (June 17, 2025 Letter) (reducing the total number of requested simultaneously operational Pelican satellites).

¹⁵ See ICFS 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);

GRANT

Planet Labs PBC

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	• 12 Flock 2p satellites deployed at 505 km with an inclination of 97.51° by the PSLV launch vehicle; • 529 Flock 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. Authority to allow no more than 120 Flock satellites to be deployed to orbits that exceed an apogee altitude of 550 kilometers, rather than 500 kilometers.¹⁶ Authority to construct, deploy and operate two satellites, SkySat-1 and SkySat-2, in high-inclination circular orbits.¹⁷ Authority to construct, deploy, and operate SkySat-3.¹⁸ 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.¹⁹ 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.²⁰ 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.²¹ Consolidation of the SkySat satellites (Call Sign S2862) and the Flock satellites (Call Sign S2912) under one call sign (Call Sign S2912).²²
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SAT-MOD-20140912-00100 (granted Oct. 23, 2014); SAT-MOD-20140321-00032 (granted June 18, 2014); SAT-LOA-20130626-00087 (granted Dec. 3, 2013); ICFS File No. SAT-MOD-20170713-00103 (granted Jul. 19, 2018).

¹⁶ See ICFS 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).

¹⁷ See ICFS File No. SAT-LOA-20120322-00058 (granted Sept. 20, 2012).

¹⁸ See ICFS File No. SAT-MOD-20150408-00019 (granted in part and deferred in part June 10, 2016).

¹⁹ See ICFS File No. SAT-MOD-20150408-00019 (granted Aug. 31, 2016).

²⁰ See ICFS File No. SAT-MOD-20170317-00053 (granted June 29, 2017).

²¹ See ICFS File No. SAT-MOD-20191217-00148 (granted March 16, 2020).

²² See ICFS File No. SAT-MOD-20200615-00076 (granted March 18, 2021).

GRANT

Planet Labs PBC

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	Authority to deploy and operate up to 7 technically-identical,²³ NGSO satellites to be known as the Pelican satellites.²⁴ Modification of C-band intersatellite link operations for the Pelican-2 satellite to: (1) reflect an increase in the number of low-gain C-band receive antennas from one to three; (2) revise the bandwidth for its C-band receive signals in the 4000-4200 MHz band from 2 megahertz to a range of 1-10 megahertz and the bandwidth for the C-band transmit signals in the 6225-6425 MHz band from 2 megahertz to a range of 1-10 megahertz; and (3) reflect the replacement of the low-gain C-band omnidirectional transmit antenna with a higher gain transmit antenna; and (3) update receive and transmit bandwidths to be in the 4000 MHz – 4200 MHz range, with only one operational at any time.²⁵ Modification of operations for Planet to operate using a 6.25% duty cycle in the 2025-2110 MHz (Earth-to-space) frequency band to communicate with the Pelican satellites, except for the 2066.6 MHz uplink, which Planet Labs must operate with a duty cycle of 5%.²⁶ Authority to operate inter-satellite link (ISL) operations with a single satellite in the Pelican constellation in the 27.5-29.1 and 29.5-30 GHz bands, limited to short duration demonstrations to certain medium Earth orbit O3b mPOWER satellites and Telesat low Earth orbit Croucier satellites in accordance with condition 2 of the grant for a period of 180 days.²⁷ Modification of C-band intersatellite link operations for the Pelican-2 satellite to: (1) reflect an increase in the number of low-gain C-band receive antennas from one to three; (2) revise the bandwidth for its C-band receive signals in the 4000-4200 MHz band from 2 megahertz to a range of 1-10 megahertz and the bandwidth for the C-band transmit signals in the 6225-6425 MHz band from 2 megahertz to a range of 1-10 megahertz; and (3) reflect the replacement of the low-gain C-band omnidirectional transmit antenna with a
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²³ See ICFS File No. SAT-MOD-20220421-00042 (granted in part and deferred in part Aug. 31, 2023). Planet's modification application was deferred with respect to the requests for an additional 25 Pelican satellites and replacement satellites, and with respect to certain operations in the 6225-6425 MHz band. See *id.* at conditions 8 and 14. Consistent with condition 8, we continue to require Planet to file and receive approval by the Commission of a modification to the application with an updated orbital debris mitigation demonstration addressing the re-entry casualty risk associated with the deployment of these future Pelican satellites.

²⁴ On January 17, 2023, Space Exploration Technologies Corp. (SpaceX) filed an *ex parte* letter. Letter from David Goldman, Director of Satellite Policy, SpaceX, to Marlene H. Dortch, Secretary, FCC at 1 (dated Jan. 17, 2023) (*SpaceX Letter*). See *Planet Labs PBC, Application for Modification of License*, ICFS File No. SAT-MOD-20220421-00042, Order, DA 23-799, para. 4, n.9 (SB, SPPD rel. Aug. 31, 2023).

²⁵ See *Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Actions Taken*, DA 1177, Public Notice, Report No. SAT-01874 (Nov. 22, 2024) (ICFS File No. SAT-MOD-20240723-00157).

²⁶ See *Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Actions Taken*, DA 24-1280, Public Notice, SAT-Report No. 01881 (granted Dec. 20, 2024).

²⁷ Planet Labs PBC, Application to Modify License, ICFS File No. SAT-MOD-20240830-00196 (granted Jul. 30, 2025).

GRANT

Planet Labs PBC

ICFS File Nos. SAT-MOD-20231031-00269; SAT-AMD-20250130-00033; SAT-AMD-20231127-00290; SAT-MOD-20220421-00042; SAT-MOD-20240723-00157; SAT-MOD-20250527-00129

	higher gain transmit antenna; and (3) update receive and transmit bandwidths to be in the 4000 MHz–4200 MHz range, with only one operational at any time.²⁸ Modification of C-band intersatellite link operations for the Pelican-3 and Pelican-4 satellites to: (1) reflect an increase in the number of low-gain C-band receive antennas from one to three; (2) revise the bandwidth for its C-band receive signals in the 4000-4200 MHz band from 2 megahertz to a range of 1-10 megahertz and the bandwidth for the C-band transmit signals in the 6225-6425 MHz band from 2 megahertz to a range of 1-10 megahertz; and (3) reflect the replacement of the low-gain C-band omnidirectional transmit antenna with a higher gain transmit antenna; and (3) update receive and transmit bandwidths to be in the 4000 MHz–4200 MHz range, with only one operational at any time.²⁹ Modification of C-band intersatellite link operations for the Pelican-5 and Pelican-6 satellites to: (1) reflect an increase in the number of low-gain C-band receive antennas from one to three; (2) revise the bandwidth for its C-band receive signals in the 4000-4200 MHz band from 2 megahertz to a range of 1-10 megahertz and the bandwidth for the C-band transmit signals in the 6225-6425 MHz band from 2 megahertz to a range of 1-10 megahertz; and (3) reflect the replacement of the low-gain C-band omnidirectional transmit antenna with a higher gain transmit antenna; and (3) update receive and transmit bandwidths to be in the 4000 MHz–4200 MHz range, with only one operational at any time.³⁰
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:	8025-8400 (space-to-Earth) (remote sensing data and telemetry) (Flock, SkySat, and Pelican) 2025-2110 MHz (Earth-to-space) (remote sensing data and command) (Flock, SkySat, and Pelican) 25.5-27.0 GHz (space-to-Earth) (data downlink) (Pelican satellites only) 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) 161.9625-161.9875 MHz (AIS 1) and 162.0125-162.0375 MHz (AIS 2) (up to 3 demonstration satellites) (Flock satellites only) <u>Inter-satellite links:</u>³¹

²⁸ *See Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Actions Taken*, DA 24-1177, Public Notice, SAT-Report No. 01874 (granted Nov. 21, 2024) (re-issued to correct to grant-in-part July 10, 2025).

²⁹ ICFS File No. SAT-MOD-20240723-00157 (granted in part, deferred in part July 10, 2025).

³⁰ ICFS File No. SAT-MOD-20240723-00157 (granted in part, deferred in part Sept. 25, 2025).

³¹ Planet’s Pelican satellites would communicate with certain non-U.S. licensed SES satellites operating in geostationary satellite orbit (GSO). *See* Letter from Daniel C.H. Mah, Vice President, Legal & Regulatory Affairs, New Skies Satellites B.V. (SES), to Marlene H. Dortch, Secretary, FCC (filed Feb. 1, 2023) in ICFS File No. SAT-MOD-20220421-00042). SES states that it has made arrangements with Planet for its Pelican constellation to

GRANT

Planet Labs PBC

ICFS File Nos. SAT-MOD-20231031-00269; SAT-AMD-20250130-00033; SAT-AMD-20231127-00290; SAT-MOD-20220421-00042; SAT-MOD-20240723-00157; SAT-MOD-20250527-00129

	4000-4200 MHz (space-to-space) (inter-satellite link) (reception by Pelican satellites only) 6225-6425 MHz (space-to-space) (inter-satellite link) (transmission by Pelican satellites only) 27.5-29.1 GHz (space-to-space) (inter-satellite link) (reception by Pelican satellites only) 29.5-30 GHz (space-to-space) (inter-satellite link) (transmission by one Pelican satellite) ³²
Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications and commitments 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: - Planet's operations in the 8025-8400 MHz (space-to-Earth) band are subject to the following condition: - 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.³³ Transmissions of remote-sensing and telemetry data in the 8025-8400 MHz frequency band may only be made to earth stations coordinated with NASA.³⁴ Planet must provide the FCC with a list of coordinated earth stations, and must provide the FCC with an updated list within ten business days following any changes to the list. - Planet's operations in the 2025-2110 MHz (Earth-to-space) band are subject to the following conditions: - Use of the 2025-2110 MHz band (Earth-to-space) will be limited to 6.25% duty cycle per satellite (except for the 2066.6 MHz uplink, which must operate with a duty cycle of 2.6% for Pelican satellites, per earth station, and no emissions on 2086.1 MHz when the NASA International Space Station (ISS), NORAD ID 25544, is within 5° of the respective earth station antenna boresight. Planet Labs' S-band uplink to	

communicate with the following SES C-band satellites, all of which are Netherlands licensed and have been granted U.S. market access: (1) NSS-9 at 177° W.L. (Call Sign S2756); (2) SES-4 at 22° W.L. (Call Sign S2828); and (3) SES-6 at 40.5° W.L. (Call Sign S2870). *Id.* Pelican will also communicate with another Netherlands-licensed SES spacecraft, NSS-12 at 57° E.L. *Id.*

³² Operations in the 27.5-29.1 GHz and 29.5-30 GHz frequency bands are limited to Pelican satellites for 180-day, time-limited demonstration operations as specified in the Scope of Grant. *See* ICFS File No. SAT-MOD-20240830-00196, condition 2 (granted Jul. 30, 2025). Specifically, Planet Labs is permitted to operate, for ISL testing purposes, in the 27.5-29.1 and 29.5-30 GHz bands on a non-conforming basis using a single satellite in its Pelican constellation for three demonstrations, on an unprotected and non-interference basis. Planet Labs is authorized for a period of 60 days for one Pelican satellite for its Demo 1 to validate use of Ka-band hardware; for a period of 180 days for one Pelican satellite for its SES Demo supporting the NASA Communications Service Project (CSP); and for a period of 180 days for one Pelican satellite for its Telesat Demo supporting the NASA CSP. *See id.*

³³ This includes, for the Flock satellites, transmissions in the 8025-8400 MHz band to the Maddock, ND, and Keflavik, Iceland, earth stations. *See* ICFS File No. SAT-MOD-20170713-00103, grant in part May 24, 2018, at para. 8.

³⁴ 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* ICFS 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 ICFS File No. SAT-MOD-20170713-00103); *see also* ICFS File No. SAT-MOD-20170713-00103, Narrative Exhibit 43 at 1.

GRANT

Planet Labs PBC

ICFS File Nos. SAT-MOD-20231031-00269; SAT-AMD-20250130-00033; SAT-AMD-20231127-00290; SAT-MOD-20220421-00042; SAT-MOD-20240723-00157; SAT-MOD-20250527-00129

maintain min C/I of 25 dB so max EIRP (per carrier) must not exceed 46 dBW.³⁵

- b. For uplinks centered at 2083 MHz, earth stations supporting SkySat transmissions must cease when the International Space Station (NORAD ID: 25544) is within 5 degrees of the respective earth station antenna boresight.
 - c. For uplinks centered at 2056.6 MHz, earth stations supporting the Flock or Pelican satellites must cease all transmissions when the future NASA Landsat-Next spacecraft are within 10 degrees of the respective earth station antenna boresight. It may be possible to relax this condition for launch and early orbit phase (LEOP) operations (defined as the first ten (10) days of operation after launch) contingent upon successful coordination with NASA. Coordination requests must be submitted to NASA (hq-satcoord@mail.nasa.gov) at least thirty (30) days prior to launch.
 - d. For uplinks centered at either 2054.7 MHz or 2057.3 MHz, the maximum transmit duty cycle from each supporting earth station to each individual Flock satellite must be limited to 6.5 %, and operations on each frequency must involve no more than a total of 14 Flock satellites at any given time.
 - e. For uplinks centered at either 2066.6 MHz or 2096.1 MHz, the maximum transmit duty cycle from each supporting earth station to each individual Tanager or Pelican satellite must be limited to 6.5 %, and operations on each frequency must involve no more than a total of 14 satellites at any given time from the Tanager satellites, Pelican satellites, or any combination of the two.
3. Planet's operations in the 25.5-27.0 GHz (space-to-Earth) band are subject to the following condition:
 - a. In the 25.25-27.5 GHz band, power flux density operations must not exceed limits in Recommendation ITU-R SA.1862, recommend #5.
 4. Planet's operations in the 401-402 MHz (space-to-Earth) and 449.75-450.25 MHz (Earth-to-space) bands are subject to the following conditions:
 - a. Operations of the Planet Flock satellites in the 401.3 MHz (space-to-Earth) to "Low Speed Only" stations³⁶ must cease when the Argos-4 satellites³⁷ are within view of those earth stations.
 - b. In order to protect NOAA radiosondes operations in the United States, operations in 401.3 MHz (space-to-Earth) are limited to the Flock satellite system transmissions and shall not exceed the long-term interference criteria limit of -162.4 dBW, as specified in Table 2 (Type C) of Recommendation ITU-R RS.1263-3.
 5. Planet's space-to-space operations in the 4000-4200 MHz and 6225-6425 MHz bands are subject to the following condition:
 - a. Planet Lab's request for waiver of the U.S. Table of Frequency Allocations, 47 CFR § 2.106, for communications between its Pelican satellites and certain satellites operating in the GSO arc (i.e.,

³⁵ Pelican satellites uplink transmission at 2066.6 MHz from the Chitose, Japan Earth station must be limited to a maximum duty cycle of 16% during periods of mutual visibility with the Suomi NPP (NORAD ID: 37849), JPSS-1 (NORAD ID: 43013), JPSS-2 (NORAD ID: 54234), JPSS-3 (NORAD ID: TBD launch FY27), and JPSS-4 (NORAD ID: TBD launch FY32) space-to-space TDRS forward links; specifically, TDRS-06 (NORAD ID: 22314), TDRS-07 (NORAD ID: 23613), TDRS-08 (NORAD ID: 26388), TDRS-10 (NORAD ID: 27566), TDRS-11 (NORAD ID: 39070), TDRS-12 (NORAD ID: 39504), and TDRS-13 (NORAD ID: 42915).

³⁶ Low Speed Only earth stations include the following: Fairbanks, AL.; Brewster, WA; Ningi, AUS; Oahu, HI; Cape Town, SA; Keflavik, Iceland; Goonhilly, UK; Maddock, ND USA; Awarua, New Zealand; and Inuvik, Canada.

³⁷ The Argos-4 satellites included in this authorization are the Gazelle (NORAD ID: 54023) and the Oceansat-3/EOS-6 (NORAD ID: 54361).

GRANT

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communications in the space-to-space direction) is GRANTED.³⁸ Planet Lab's request was previously GRANTED-IN-PART.³⁹ We note that while the C-band frequencies are not allocated for inter-satellite operations, in this particular case, given the nature of Planet Lab's operations and Planet Lab's willingness to accept a frequency assignment on a non-interference, unprotected basis, we find that Planet is able to operate consistent with its application without causing harmful interference.

6. Planet's radiofrequency communications are also subject to the following conditions:
 - a. Transmissions in the 401-402 MHz, 449.75-450.25 MHz, 2025-2110 MHz and 8025-8400 MHz are limited to the center frequencies coordinated with Federal users. Additionally, the coordinated earth stations are noted in the Appendix for the appropriate satellite missions.
 - b. This authorization includes the previously-granted 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 MHz band are subject to the agreement regarding the Flock satellites reached between Planet Labs and NASA in this band.⁴⁰
 - c. This authorization includes the previously-granted waiver of the modified processing round requirements of 47 CFR §§ 25.156 and 25.157 for Planet's operations in the 8025-8400 MHz band. Given the opportunity for additional entrants to operate in the 25.5-27.0 GHz band, we also grant Planet Lab's request for waiver of the modified processing round requirements with respect to this additional band for its Pelican satellites. *See DigitalGlobe, Inc.*, Order and Authorization, 20 FCC Rcd 15696 (Sat. Div., Int'l Bur. 2005), at paragraph 8. For the same reasons, we waive the modified processing round requirements for Planet Lab's requested inter-satellite operations with its Pelican satellites in the 4000-4200 MHz (space-to-space) and 6225-6425 MHz (space-to-space) frequency bands, specifically, we grant waiver with respect to reception on an unprotected basis of signals from certain GSO satellites and with respect to the inter-satellite link transmissions from a single satellite to certain GSO satellites for limited periods of time. *See condition 5A.*
 - d. 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 relevant frequency bands, we continue to grant Planet Lab's request for a waiver of the default service rules in 47 CFR § 25.217(b), including for the additional operations authorized here for its Pelican satellites. *See DigitalGlobe, Inc., supra*, at paragraph 6C.
7. Planet is also subject to the following conditions regarding its Flock satellites:
 - a. The number of simultaneously operational Flock satellites must not exceed 200.⁴¹
 - b. No more than 120 Flock satellites may be deployed to orbits that exceed an apogee altitude of 550

³⁸ These operations were previously granted in part. *See Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Actions Taken*, DA 23-911, Public Notice, Report No. SAT-01762 (Sept. 29, 2023) (ICFS File No. SAT-MOD-20220421-00042) (granted in part Sept. 1, 2023; reissued Sept. 29, 2023).

³⁹ *See* ICFS File No. SAT-MOD-20220421-00042 (granted in part Sept. 1, 2023; reissued Sept. 29, 2023).

⁴⁰ *See* Condition 2. *See also* ICFS File No. SAT-MOD-20200615-00076 (granted March 18, 2021).

⁴¹ 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.

GRANT

Planet Labs PBC

ICFS File Nos. SAT-MOD-20231031-00269; SAT-AMD-20250130-00033; SAT-AMD-20231127-00290; SAT-MOD-20220421-00042; SAT-MOD-20240723-00157; SAT-MOD-20250527-00129

kilometers.

- c. 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.

8. Planet Labs must provide a semi-annual report, by January 1 and July 1 each year, covering the preceding six month period, respectively, from June 1 to November 30 and December 1 to May 31. The report should include the following:

- a. Number of conjunction events identified for Planet Labs satellites during the reporting period, and the number of events that resulted in an action (maneuver or coordination with another operator), as well as any difficulties encountered in connection with the collision avoidance process and any measures taken to address those difficulties.
- b. Planet Labs must report any loss of control of Pelican satellites at altitudes above 350 km⁴² not later than 10 days following the loss of control.⁴³
- c. In the event of Pelican satellite failures resulting in more than 100 post-failure object years, Planet Labs may not deploy any additional Pelican satellites until the Commission has approved a license modification that includes an updated orbital debris mitigation plan addressing reduction in the failure rate or mitigation of the risk of satellite failures.

9. Planet Lab's request for a limited waiver of section 25.114(c) of the Commission's rules, which requires certain information to be filed in the Form 312, Schedule S, is GRANTED. Planet Labs notes that it has provided placeholder data in the form in some places, since some of the categories (e.g., max/min saturation flux density, antenna pointing error, and antenna rotational error) are inapplicable and/or do not permit the entry of correct values. We grant waiver on the basis that Planet Labs has implemented workarounds where necessary to provide the information to the Commission necessary to evaluate the application.

10. This authorization will become null and void regarding Flock satellites if, at any time during the license term, there are no Flock satellites operating; with regard to SkySat satellites, if there are no SkySat satellites operating; and with regard to the Pelican satellites, if there are no Pelican 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.

11. With respect to the 24 authorized Pelican satellites, Planet Labs is subject to the following:⁴⁴

- a. Planet Labs maintains on file its surety bond requiring payment in the event of a default in an amount, at minimum, determined according to the formula set forth in 47 CFR § 25.165(a)(1); and
- b. Planet Labs must launch 50 percent of the maximum number of authorized Pelican space stations, place them in the assigned orbits, and operate them in accordance with this grant no later than **August 31, 2029**, and must launch the remaining Pelican space stations necessary to complete its authorized service constellation, place them in their assigned orbits, and operate them in accordance

⁴² The first Pelican satellite will operate in SSO at an inclination of 96.7 degrees, with an expected commissioning altitude of 525 km +/- 25 km, and then enter its operational altitude of 325 km +/- 25 km, within approximately six to twelve months; and the next six Pelican satellites, with an expected commissioning altitude between 250 km and 550 km, and then an approximately three-month transfer to their final operational altitude of 325 km +/- 25 km. See ICFS File No. SAT-MOD-20220421-00042, Planet Tech. App. at 1-2.

⁴³ Condition corrected in reissue of grant conditions on September 28, 2023 to conform to the Division's order in DA 23-799. See *Planet Labs PBC, Application for Modification of License*, ICFS File No. SAT-MOD-20220421-00042, Order, DA 23-799, para. 4, n.9 (SB, SPPD rel. Aug. 31, 2023).

⁴⁴ We note that this milestone condition extends beyond the current license term. Such milestone dates would become applicable in the event of a license extension.

GRANT

Planet Labs PBC

ICFS File Nos. SAT-MOD-20231031-00269; SAT-AMD-20250130-00033; SAT-AMD-20231127-00290; SAT-MOD-20220421-00042; SAT-MOD-20240723-00157; SAT-MOD-20250527-00129

with the authorization no later than **August 31, 2032**. 47 CFR § 25.164(b).⁴⁵

12. 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.

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:	January 30, 2026
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Term Dates	From: January 30, 2026	To: February 28, 2029
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Approved:

Jonathan R. Markman
Acting Chief, Satellite Programs and Policy Division

⁴⁵ We note that although we authorize Planet to operate in additional frequencies on its Pelican satellites and with an additional 17 Pelican satellites, we retain the current milestones for the Pelican constellation. See 47 CFR § 25.164(h).

ATTACHMENT TO GRANT

Planet Labs PBC

ICFS File Nos. SAT-MOD-20231031-00269; SAT-AMD-20250130-00033; SAT-AMD-20231127-00290;
SAT-MOD-20220421-00042; SAT-MOD-20240723-00157; SAT-MOD-20250527-00129

Appendix

Federal coordinated earth stations for **PELICAN**:

Svalbard (Norway)
Keflavik (Iceland)
Inuvik, NW (Canada)
Lewisporte, NL (Canada)
Maddock, ND (USA)
Awarua (New Zealand)
Taiki, Hokkaido (Japan)
Chitose (Japan)
Tromso (Norway)
GCI, Fairbanks, AK (USA)
Punta Arenas (Chile)
Nangetty, Western Aus (AUS)
Goonhilly (United Kingdom)
Singapore

Federal coordinated earth stations for **SKYSAT**:

Maddock, ND (USA)
GCI, Fairbanks, AK (USA)
Inuvik, NW (Canada)
Punta Arenas (Chile)
Goonhilly (United Kingdom)
Svalbard (Norway)
Tromso (Norway)
Awarua (New Zealand)
Dededo, Guam (USA)
Nangetty, Western Aus (AUS)
Taiki, Hokkaido (Japan)
Singapore
Lewisporte, NL (Canada)
Keflavik (Iceland)
Jeju (Korea)

Federal coordinated earth stations for **FLOCK**:

Maddock, ND (USA)
GCI, Fairbanks, AK (USA) (S-band and X-band only)
Inuvik, NW (Canada)
Punta Arenas (Chile) (S-band and X-band only)

ATTACHMENT TO GRANT

Planet Labs PBC

ICFS File Nos. SAT-MOD-20231031-00269; SAT-AMD-20250130-00033; SAT-AMD-20231127-00290;
SAT-MOD-20220421-00042; SAT-MOD-20240723-00157; SAT-MOD-20250527-00129

Appendix (cont.)

Goonhilly (United Kingdom)
Svalbard (Norway) (S-band and X-band only)
Tromso (Norway) (S-band and X-band only)
Awarua (New Zealand)
Dededo, Guam (USA) (S-band and X-band only)
Nangetty, Western Aus (AUS)
Taiki, Hokkaido (Japan) (S-band and X-band only)
Singapore (S-band and X-band only)
Lewisporte, NL (Canada) (S-band and X-band only)
Keflavik (Iceland)
Brewster, WA (USA) (UHF only)
Fairbanks, AK (University of AK Fairbanks) (UHF only)
Oahu, HI (UHF only)
Cape Town, South Africa (UHF only)