

APPLICATION FOR EXTENSION OF LICENSE

Spaceflight, Inc. (“Spaceflight”) respectfully requests to extend the end date of the license (Call Sign: S3133) for its authorized spacecraft, Sherpa-AC1, for one year, *i.e.*, from June 9, 2023, to June 9, 2024.¹ Spaceflight intends to cease transmissions by the relevant deadline, unless the FCC grants the application before then.²

Renewal of the license would allow Spaceflight to continue testing and validating the proof of concept of the Xona Space Systems, Inc. (“Xona”) hosted payload onboard Sherpa-AC1.³ Xona aims to bring to market a commercial satellite-based Position, Navigation, and Timing service to enhance resiliency, accuracy, and security of a technology that has been the backbone of U.S. national security and economy for almost 50 years. Xona’s demonstration payload aboard the Sherpa AC-1 is the first step towards a modern commercial satellite navigation service that meets the growing and evolving demands of technologies coming online in the near and distant future, such as intelligent transportation systems.

Xona’s payload on Sherpa AC-1 has been providing invaluable data regarding Xona’s core technology, and further testing would facilitate Xona’s goal of providing modern Global Navigation Satellite System services to the U.S. and the world. One of the pivotal tests is to transmit Xona’s signal in the L-band frequencies, but authorization to transmit in this band over the U.S. has been deferred, and spectrum coordination efforts are still in progress. An extension to the Sherpa AC-1 authorization would allow for completion of these coordination discussions and the testing of the Xona payload.

Additionally, grant of the license extension will allow the Spaceflight operations team to continue to use the Sherpa-AC1 as an operational testbed for future Sherpa missions. Spaceflight’s current generation of Sherpas, which began flying in 2021, provides customers with options to achieve orbital diversification by delivering them to orbits distinct from the injection orbit they would achieve from a traditional launch vehicle. This particular Sherpa mission employs a new type of Sherpa vehicle, the Sherpa-AC, which has the ability to operationally persist while providing active attitude control for a mission that extends beyond the very limited time period of operation of past Sherpa-FX vehicles. The ability to continue to operate this new Sherpa vehicle will provide invaluable insight for future Sherpa missions based on this vehicle, while also supporting the operation of the Xona navigational payload that is hosted on this mission.

¹ See 47 C.F.R. § 25.117; Spaceflight, Inc., Application for Satellite Space Station Authorizations, IBFS File No. SAT-LOA-20220111-00007 (granted May 10, 2022) (“Sherpa-AC1 Application”); *see also* Letter from Philip Hover-Smoot, Spaceflight, Inc., to Marlene H. Dortch, FCC, IBFS File No. SAT-LOA-20220111-00007 (filed June 9, 2022) (identifying June 9, 2022, as the date of commencement of operations).

² Pursuant to the license conditions, the term of the license is not subject to extension. *See* Sherpa-AC1 Application, at Conditions 7 and 13.

³ *See* Sherpa-AC1 Application, Narrative at 2.

Spaceflight will reach out to the relevant federal spectrum managers to pre-coordinate its proposed spectrum use. Further, the modest extension of time does not raise any long-term policy concerns regarding spectrum use, and the same justifications supporting the initial one-year license term support this extension request.⁴

For these reasons, Spaceflight submits that an additional one-year extension of its license term is in the public interest.

Updated ownership information for Spaceflight is provided in Attachment A. There are no other requested changes to the license.

⁴ Spaceflight incorporates by reference the relevant requested and granted waivers associated with the Sherpa-AC1 Application. See Spaceflight, Inc., Application for Satellite Space Station Authorizations, IBFS File No. SAT-LOA-20220111-00007, Exhibit 7 (filed Jan. 11, 2022); Sherpa-AC1 Application, at Conditions 7 and 13.

ATTACHMENT A

Ownership Information

Spaceflight, Inc. is a wholly owned subsidiaries of Japanese company, M&Y Space Co., Ltd.

Ownership of Spaceflight, Inc.:

M&Y Space Co., Ltd.

2-1, Otemachi 1-chome

Chiyoda-ku, Tokyo 100-8631,

Japan

Owns 100% of Spaceflight, Inc., stock and has 100% voting rights.

Officers and Directors of Spaceflight, Inc.:

c/o Spaceflight, Inc.

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Ryan Bates

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Chief Executive Officer and Director

David Ekizian

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Chief Financial Officer

Philip Hover-Smoot

General Counsel and Secretary