Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
LOGOS SPACE SERVICES, INC.	)	File No. SAT-MOD-2026_______
	)	
Modification of Logos Authorization to Construct, Launch, and Operate a Non-Geostationary Orbit System in the Fixed Satellite Service	)	Call Sign: S3210

MODIFICATION OF AUTHORIZATION

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TABLE OF CONTENTS

EXHIBIT LIST

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MODIFICATION OF AUTHORIZATION

Pursuant to Section 25.117 of the Federal Communications Commission's ("Commission") rules,[1] Logos Space Services, Inc. ("Logos") hereby seeks to modify its current authorization to launch and operate a non-geostationary orbit ("NGSO") Fixed-Satellite Service ("FSS") network (the "Logos Network") to add FSS downlinks in the 17.3-17.8 GHz band ("17 GHz band") across all licensed satellites.[2] Grant of this Modification will serve the public interest by strengthening the resiliency and capacity of the Logos Network in its provision of connectivity services for American businesses, wherever they may be located.

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[1] 47 C.F.R. § 25.117.

[2] *See Logos Space Services, Inc., Application to Construct, Launch, and Operate a Non-Geostationary Orbit System in the Fixed-Satellite Service*, Stamp Grant, ICFS File Nos. SAT-LOA-20241030-00243 & SAT-AMD-20250328-00084 (Jan. 30, 2026) ("Logos Grant"); Logos Space Services, Inc., Application to Construct, Launch, and Operate a Non-Geostationary Orbit System in the Fixed-Satellite Service, ICFS File No. SAT-LOA-20241030-00243 (filed Oct. 30, 2024) ("Logos Application"); Logos Space Services, Inc., Amendment to Pending Application to Construct, Launch, and Operate a Non-Geostationary Orbit System in the Fixed-Satellite Service, ICFS File No. SAT-AMD-20250328-00084 (filed Mar. 28, 2025) ("Logos Amendment" and together with the Logos Application, the "Logos Initial Application").

This application identifies all changes to the Logos Network. A completed Form 312, accompanying Schedule S, and Technical Annex are being submitted with this Legal Narrative.[3] Logos certifies that, except as described herein, all other aspects of the Logos Network remain unchanged and are incorporated herein by reference.[4]

I. LOGOS SPACE SERVICES, INC.

Founded in 2024, Logos is a California-based company focused on providing next-generation satellite-based connectivity services to enterprise customers. In today's business environment, enterprise customers require robust and dependable connectivity solutions to support critical operations, from data-intensive applications to cloud computing and real-time communication platforms. The Logos Network is engineered to meet these demands, offering secure, resilient, satellite-based connectivity wherever and however businesses operate.

II. DESCRIPTION OF THE MODIFICATION

Logos is currently authorized to deploy and operate an FSS NGSO satellite system consisting of 4,178 satellites deployed in seven shells between 860 km and 925 km altitude.[5] Logos seeks to modify this authorization to also permit space-to-Earth service in the 17 GHz band consistent with the existing co-primary FSS allocation for the band in the U.S. Table of Frequency Allocations and the Commission's rules.[6]

Logos plans to use the 17 GHz band for service downlinks to customer terminals when Q-band space-to-Earth communications are not practical due to high levels of atmospheric

[3] *See* 47 C.F.R. § 25.117.

[4] 47 C.F.R. § 25.117(c). *See generally* Logos Grant; Logos Initial Application.

[5] *See* Logos Grant.

[6] 47 C.F.R. § 2.106. *See also Amendment of Parts 2 and 25 of the Commission's Rules to Enable NGSO Fixed-Satellite Service (Space-to-Earth) Operations in the 17.3-17.8 GHz Band,* Report and Order, IB Docket No. 22-273, at ¶ 1 (2024) ("*17 GHz Band NGSO R&O*").

attenuation. The Logos Network's spectrum usage plan for the 17 GHz band is detailed below in Table 1. Satellite downlink transmissions can be turned on and off by ground telecommand in compliance with Commission rules.[7]

Frequency Band	Link Direction	Use
17.3-17.8 GHz	Space-to-Earth	Service

Table 1 Frequency Band, Direction, and Use

Logos will use the 17 GHz band consistent with the U.S. Table of Frequency Allocations and the Commission's technical rules in the band.[8] At the time of filing this Modification, Logos is aware of only two other NGSO operators who have requested access to the 17 GHz band for FSS.[9] The Commission recently granted one of these requests.[10] Thus, the risk of interference with co-frequency NGSO FSS operators is minimal, and can be easily mitigated. The Technical

[7] *See generally* Exhibit A, Technical Annex ("Technical Annex"); 47 C.F.R. § 25.207.

[8] *See generally 17 GHz Band NGSO R&O*; 47 C.F.R. § 25.146. Logos notes that the Commission's NGSO-GSO sharing regime in the 17 GHz band is subject to a pending Notice of Proposed Rulemaking. *See Modernizing Spectrum Sharing for Satellite Broadband*, Notice of Proposed Rulemaking, SB Docket No. 25-157, FCC 25-23 (Apr. 29, 2025). While the Logos Network will satisfy the current EPFD limits as set forth in the Commission's existing rules, Logos also requests authority to bring its 17 GHz operations into conformance with the outcome of any Commission or international proceeding to update the EPFD rules in the downlink in the United States upon adoption of those new limits.

[9] *See* Application of Space Exploration Holdings, LLC for Amendment of the SpaceX Gen2 NGSO Satellite System, File No. SAT-AMD-20241017-00228, Call Sign S3069/S2992 (filed Oct. 17, 2025) ("SpaceX 17 GHz Amendment"); Application of Kuiper Systems LLC to Amend Pending Application for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in V-band, Ku-band, Ka-band, and 17 GHz Band Frequencies, File No. SAT-AMD-20250311-00068 (filed Mar. 11, 2025) (*pending*) ("Kuiper 17 GHz Amendment").

[10] *Space Exploration Holdings, LLC, Request for Deployment and Operating Authority for the SpaceX Gen2 NGSO Satellite System*, Authorization and Order, DA 26-36 (Jan. 9, 2026) ("SpaceX 17 GHz Grant").

Annex provides additional details of Logos's planned operations in the 17 GHz band and its ability to coexist with co-frequency and adjacent band users.[11]

III. GRANT OF THE REQUESTED MODIFICATION WILL BENEFIT THE PUBLIC INTEREST

Grant of this Modification will promote the public interest by improving the coverage, quality, reliability, and sustainability of the Logos Network without causing interference to other NGSO or GSO systems. The 17 GHz band is particularly well-suited to augment existing service downlinks during periods of adverse weather—such as heavy rain events—when higher-frequency channels subject to rain attenuation become less practical. By adding the 17 GHz spectrum to its system architecture, Logos will be able to better maintain robust connectivity for its enterprise customers, ensuring uninterrupted services.

Moreover, a prompt grant of this Modification aligns squarely with the Commission's objectives of advancing American innovation, accelerating deployment of next-generation technologies, and ensuring that critical spectrum resources are put to productive use. The Commission has repeatedly emphasized the importance of realizing "satellite spectrum abundance" to enable next-generation space services as expeditiously as possible.[12] Logos stands ready to utilize the 17 GHz band as part of its next-generation satellite network to deliver resilient, high-throughput services for enterprise customers in support of critical functions across industries and communities nationwide. Grant of this Modification would ensure the 17 GHz band is swiftly

[11] *See* Technical Annex at 2.

[12] *See, e.g.*, *Satellite Spectrum Abundance*, Further Notice of Proposed Rulemaking and Notice of Proposed Rulemaking, SB Docket No. 25-180, GN Docket Nos. 22-352 & 14-177, WT Docket No. 23-158, FCC 25-29 (2025); *id.*, Statement of Chairman Carr ("Abundant spectrum for satellite operations is not just nice to have. It is necessary for American leadership. Every megahertz matters.").

brought into use providing immediate public benefit, and further supporting the robust, competitive, and American-led space sector.

IV. WAIVER REQUESTS

Logos respectfully requests waiver of certain Commission rules to facilitate the consideration of this Modification. The Commission may waive its rules if there is "good cause" to do so.[13] In general, good cause exists if "special circumstances warrant a deviation from the general rule" and "such deviation would better serve the public interest than would strict adherence to the general rule," including "more effective implementation of overall policy."[14] Further, in determining whether waiver is appropriate, the Commission may take into account "considerations of hardship, equity, or more effective implementation of overall policy."[15] For the following reasons, there is good cause for the Commission to waive its rules, as requested herein.

A. Administrative Processing Rules – Sections 25.156(d) and 25.157(c)

Logos requests waiver of the processing round framework under Sections 25.156(d) and 25.157(c) of the Commission's rules for its proposed operations in the 17 GHz band. The U.S. Table of Frequency Allocations was recently revised to allow co-primary NGSO FSS downlink operations in the 17 GHz band.[16] In authorizing NGSO FSS operations in the 17 GHz band, the Commission found that "NGSO FSS can share the 17 GHz band in an efficient and effective manner with GSO FSS, broadcasting-satellite service (BSS), and incumbent terrestrial fixed

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[13] *See* 47 C.F.R. § 1.3; *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

[14] *See GE American Communications, Inc.*, 16 FCC Rcd 11038, at 11041 ¶ 9 (IB 2001) (quoting *WAIT Radio*, 418 F.2d at 1159).

[15] *Id.*

[16] *17 GHz Band NGSO R&O* at ¶ 1.

service without causing harmful interference."[17] The Commission additionally stated that the new 17 GHz allocation would "align the U.S. Table with the International Table of Allocations to provide a more cohesive global framework for FSS operators and maximize the efficient use of the 17 GHz band spectrum."[18]

To rapidly put this newly allocated spectrum to good use, the Commission should waive its processing round framework for the 17 GHz band. The processing round framework is designed to establish a sharing environment among NGSO systems and "prevent one applicant from unreasonably precluding additional entry by other operators in the requested frequency band."[19] Here, the processing round framework is unnecessary because Logos's proposed operations align with the current technical parameters for the 17 GHz band, and, as demonstrated in the Technical Annex, the Logos Network can ensure appropriate spectrum sharing with both current and future in-band and adjacent-band operators.[20] Moreover, as of the time of this filing, only two other satellite operators have requested access to the 17 GHz band for NGSO FSS operations, making the possibility of interference with such co-frequency NGSO operations very low.[21] Both operators requested waiver of the processing round framework for the 17 GHz band and made technical demonstrations showing that the 17 GHz band can be effectively shared between current and future systems.[22]

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[17] *Id.*

[18] *Id.*

[19] *Myriota Pty. Ltd.*, Order and Declaratory Ruling, 35 FCC Rcd 5475, ¶ 3 (IB 2020).

[20] *See* Technical Annex at 2.

[21] *See* SpaceX 17 GHz Amendment; Kuiper 17 GHz Amendment.

[22] SpaceX 17 GHz Amendment, Waiver Requests at 20-22; Kuiper 17 GHz Amendment, Legal Narrative at 12.

Waiver of the processing round rules would also be consistent with the Commission's recent actions concerning the 17 GHz band. Specifically, the Commission recently waived its processing round framework when granting SpaceX's request to add 17 GHz band FSS operations to its Gen2 system.[23] There, the Commission found that waiver was warranted because SpaceX's proposed operations "could coexist with existing users of the band and would not preclude other operators' use of the band in the future."[24] Moreover, the Commission determined that waiver of the processing framework would be "more efficient and in the public interest . . . than it would be to initiate additional processing rounds at this time."[25] The same circumstances exist here. Accordingly, processing the instant Modification without initiating a lengthy processing round procedure will serve the public interest by bringing the 17 GHz band into use by NGSO FSS operators as soon as possible.

B. Substantial Completion – Section 25.112(a)

To the extent necessary and out of an abundance of caution, Logos requests waiver of Section 25.112(a) of the Commission's rules. Section 25.112(a)(1) provides that an application will be deemed "unacceptable for filing and will be returned to the applicant" if it, among other potential defects, lacks "completeness of answers to questions [or] informational showings."[26]

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[23] *See* SpaceX 17 GHz Grant, ¶ 13. *See also Space Exploration Holdings, LLC, Request for Orbital Deployment and Operating Authority for the SpaceX Gen2 NGSO Satellite System*, Order and Authorization, 39 FCC Rcd 2159 ¶ 11 (2024) (finding that waiver of the processing round rules are warranted when the operations "would not create new spectrum conflicts with other operators and . . . it was more efficient to authorize the requested operations with conditions than to initiate a processing round for those frequencies").

[24] SpaceX 17 GHz Grant, ¶ 13.

[25] *Id.* ¶ 14.

[26] 47 C.F.R. § 25.112(a)(1).

The Commission's rules provide that an application found defective under Section 25.112(a)(1) may be accepted if accompanied by an appropriate waiver request.[27]

The satellites of the Logos Network are currently in the design phase, and thus, the specific details of the orbital debris mitigation plan are not fully known with certainty. Logos will furnish a complete orbital debris mitigation plan once selection and critical design review is complete. Thus, this Modification may be considered "substantially complete" under the Commission's standards, as it is clear that Logos has offered a non-frivolous, substantial proposal, and that the omission of this specific detail at this time does not detract from the ability of the Commission or other interested parties to evaluate the proposal on the merits.

C. Limitations of Schedule S - Section 25.114(c)

To the extent necessary and out of an abundance of caution, Logos requests a limited waiver of Section 25.114(c) of the Commission's rules, which requires submission of certain technical information using Schedule S.[28] Consistent with its Initial Application, Logos seeks waiver to provide a representative sample of the antenna gain contours for its downlink operations in the 17 GHz band.[29] The Logos Network will operate across multiple orbital altitudes between 860 km and 925 km and providing gain contours at each discrete orbital altitude would be duplicative without materially advancing the Commission's technical review. In lieu of submitting individual gain contours for each operational altitude, Logos has provided representative antenna gain contours for its satellites at 900 km.[30] Logos reasonably believes this approach supplies the requisite technical data for the Commission's assessment of the requested Modification, consistent

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[27] 47 C.F.R. § 25.112(b)(1).

[28] 47 C.F.R. § 25.114(c).

[29] *Id.* § 25.114(c)(4)(vi)(B).

[30] Technical Annex at Attachment B.

with the purpose of Section 25.114(c)(4)(vi)(B). Should the Commission require additional information or further detail for altitudes other than 900 km, Logos stands ready to promptly supplement the record upon request.

Grant of this limited waiver is in the public interest because it does not undermine the purpose of Section 25.114(c), where relevant. As noted above, Logos reasonably believes that it has provided all relevant information to allow the Commission to conduct an accurate assessment of this Modification, and grant of this limited waiver allows consideration of this Modification to proceed without unnecessary delay. Accordingly, grant of this waiver is appropriate and serves the public interest.

V. ITU FILINGS

Pursuant to Section 25.111 of the Commission's rules, Logos will separately provide the Commission with the appropriate electronic files for submission to the International Telecommunication Union that reflect the modifications proposed herein, including an updated ITU Cost Recovery Letter reflecting Logos's updated corporate address. Logos hereby reaffirms that it is responsible for any and all fees charged by the ITU for such filings.

VI. CONCLUSION

For the foregoing reasons, and for the reasons set forth in the accompanying materials, Logos respectfully requests prompt grant by the Commission of this Modification.

Respectfully submitted,

/s/ Milo Medin

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February 5, 2026

ATTACHMENT (OWNERSHIP INFORMATION)

Logos Space Services, Inc. ("Logos") is a California-based company formed under the laws of Delaware. The following are shareholders with 10% or more of the equity and/or voting stock in Logos:

Name: Milo Medin
Ownership: 52.2%
Citizenship: United States of America

Name: USIT Holdco PC1 LLC[31]
Ownership: 42.3%
Place of Incorporation: Delaware

The following individuals are the directors of Logos:

Name	Citizenship
Milo Medin	USA
Thomas Tull	USA

The following individuals are the officers of Logos:

Name	Title	Citizenship
Milo Medin	President, Chief Executive Officer, Chief Financial Officer, Treasurer, Secretary	USA

Each of the foregoing shareholders, directors, and officers of Logos may be reached at the following address:

Logos Space Services, Inc.
385 Ravendale Dr.
Mountain View, CA 94043

[31] USIT Holdco PC1 LLC is a Delaware limited liability company owned by US domiciled entities and controlled by US Innovative Technology GP, LLC (as manager), which is a Delaware limited liability company owned by US citizens and US domiciled entities and controlled by a US citizen.