

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of	)	ICFS File No.
	)	
Loft Orbital Solutions Inc.	)	SAT-MOD-20260626-00259
	)	
Application to Modify License	)	Call Sign: S3227
	)	

MODIFICATION APPLICATION

Loft Orbital Solutions Inc. (“Loft Orbital”) hereby requests that the Space Bureau (“Bureau”) modify the company’s license to authorize YAM-9 to sense radio frequency (“RF”) spectrum in the 1160-1606 MHz¹ frequencies and provide related services, including surveying and mapping RF spectrum usage.² While Loft Orbital will sense the full RF signal as transmitted by a source, it will not demodulate the content of any signal.

¹ The sensing of terrestrially transmitted GPS signals will only include the collection of time difference of arrival and frequency difference of arrival data for survey and mapping purposes. Loft Orbital will not collect or use the positioning, navigation, and timing data contained in the signals.

² See Stamp Grant, Loft Orbital Solutions Inc., ICFS File No. SAT-LOA-20250331-00087 (granted Jan. 19, 2024) (“License Grant”). The FCC has previously treated RF sensing services as Earth-Exploration Satellite Services (“EESS”), and accordingly, Loft Orbital’s use of the S-band and X-band frequencies, which are already authorized, would continue to be consistent with the EESS allocation. See, e.g., Stamp Grant, Hawkeye 360, Inc., ICFS File Nos. SAT-LOA-20190102-00001, SAT-AMD-20200728-00090 (granted October 20, 2022); Stamp Grant, Hawkeye 360, Inc., ICFS File No. SAT-MOD- 20210114-00010 (granted May 25, 2021); Stamp Grant, Hawkeye 360, Inc., ICFS File Nos. SAT-MOD- 20220906-00099, SAT-AMD-20221014-00136, SAT-MOD-20230724-00181 (granted in part June 10, 2024).

YAM-9 will detect and record the observable environmental characteristics (*e.g.*, Time of Arrival, Frequency of Arrival, signal bandwidth and signal power) of RF signals in the frequency ranges identified above. Loft Orbital will provide such information, including raw I/Q data, to customers. The signals of interest that will be primarily monitored and/or observed by YAM-9 are standard commercial transmissions and have waveforms that in standard operations are public standards or otherwise publicly available. At the request of customers, Loft Orbital may monitor and/or observe non-standard waveforms of signals of interest.³

The additional authority sought in this application will expand the authorized capabilities of hardware already onboard the satellite, allowing Loft Orbital to offer more services to its customers using existing equipment. Customers are requesting this type of data to identify interference sources and assess the spectrum environment in certain geographic areas, among other reasons. For the above reasons, Loft Orbital submits that the public interest would be served by grant of this application.⁴ Loft Orbital respectfully requests that the FCC grant the application so that it can provide such services as soon as possible.

Provided as Attachment A is updated ownership information. Loft Orbital is not requesting any other changes to its license, except as stated in this application.⁵ Loft Orbital will

³ Loft Orbital is aware that the provision of some data and services may be defense services under the International Traffic in Arms Regulations and is taking steps to ensure compliance with those regulations.

⁴ The Commission has previously authorized other satellite operators to provide RF sensing services. *See, e.g.*, Stamp Grant, Loft Orbital Solutions Inc., ICFS File No. SAT-MOD-20250911-00274 (granted April 7, 2026); Stamp Grant, HawkEye 360, Inc., ICFS File No. SAT-MOD-20240812-00180, at nn. 7 and 16 (granted May 30, 2025).

⁵ Loft Orbital understands that no additional technical information is necessary. There are no new signals being received (demodulated) or transmitted. Accordingly, there is no change to the Schedule S. With respect to orbital debris mitigation, the relevant antennas are already onboard the satellite and identified in the previously submitted ODAR.

inform the relevant federal spectrum managers but does not expect that there will be any coordination concerns because the proposed change does not involve new transmissions and, accordingly, does not alter the interference environment.

Respectfully submitted,

/s/ Alex Greenberg

Tony Lin
Giselle Valdez
Cooley LLP
1299 Pennsylvania Ave. NW
Suite 700
Washington, DC 20004
+1 202-728-7130

Alex Greenberg
Chief Operating Officer
Loft Orbital Solutions Inc.
321 11th Street
San Francisco, CA 94103
+1 410-382-5050

Counsel for Loft Orbital Solutions Inc.

Dated: July 2, 2026

Attachment A

Ownership Information (as of July 2026)

The following are shareholders with 10% or more of the equity and voting stock in Loft Orbital Solutions Inc. (“Loft Orbital”).

Shareholder	Citizenship/ Country of Incorporation	Percentage (equity and voting)
Foundation Capital, comprised of: Foundation Capital IX, L.P.; Foundation Capital IX Principals Fund, LLC; and Foundation Capital Leadership Fund III, L.P.	United States	~14.293% (fully diluted)

Foundation Capital (“Foundation”) is a group of venture capital investment funds headquartered in Palo Alto, California. Foundation investments have historically focused on early-stage companies. Notable Foundation investments in its 30-year history include Cerebras Systems, Cohesity, Control4 (Nasdaq: CTRL), Ebates, Envestnet (NYSE: ENV), Lending Club (NYSE: LC), Netflix (Nasdaq: NFLX), Silver Spring Networks, Sunrun (Nasdaq: RUN), TubeMogul and Turing.

Here, three Foundation funds (the “Foundation Funds”) are investors in Loft Orbital and, collectively, hold ~13.9% equity and voting interests (the “Foundation Interest”) on a fully-diluted basis, as follows:

- Foundation Capital IX, L.P. (Delaware limited partnership): ~10.559% interest;
- Foundation Capital IX Principals Fund, LLC (Delaware limited liability company): ~0.107% interest; and
- Foundation Capital Leadership Fund III, L.P. (Delaware limited partnership): ~3.62% interest.

Provided below is an organizational chart of the Foundation Funds. Each of the Foundation Funds is controlled directly or indirectly by one or more managers of the general partner entity for each specific fund (the “Foundation Managers”). For Loft Orbital, the relevant Foundation Manager is Steve Vassallo, who is a U.S. citizen, and can be reached at 550 High Street, 3rd Floor, Palo Alto, CA 94301.

There are approximately 144 passive investors in the Foundation Funds. Approximately 135 are outside investors (*i.e.*, investors not related to Foundation), who are limited partners in the primary investment funds, Foundation Capital IX, L.P. and Foundation Capital Leadership Fund III, L.P., which hold ~99.9% of the Foundation Interest in Loft Orbital. The other passive investors are Foundation partners, family members or employees – these passive investors are primarily members of Foundation Capital IX Principals Fund, LLC, which holds ~0.1% of the Foundation Interest in Loft Orbital. No individual investor of any of the Foundation Funds directly or indirectly has a 10% or greater attributable interest in Loft Orbital.

The limited partners of the Foundation Funds do not engage in any active management of the fund and, in fact, are prohibited from doing so by the fund's limited partnership agreement and/or other operative agreements. The limited partners have only the usual and customary investor protections afforded limited partners, including some of the rights identified in 47 C.F.R. § 1.5003(c). For these reasons, the limited partners meet the criteria for insulation under the FCC's rules. *See* 47 C.F.R. § 1.5003.

The following individuals are directors of Loft Orbital:

Name	Nationality
Pierre-Damien Vaujour	France
Antoine de Chassy	United States
Jean-Francois Clavier	United States
Alex Greenberg	United States
Steven Vassallo	United States
Pieter Van Duijin	Netherlands
Dominique Vincenti	France
Dr. Kathleen Hicks	United States

The following individuals are officers of Loft Orbital:

Pierre-Damien Vaujour (Chief Executive Officer and Board Chairman)
 Alex Greenberg (Chief Operating Officer)
 Pieter van Duijin (Chief Technology Officer)
 Ilan Tordjaman (Chief Financial Officer)

All of the directors and officers of Loft Orbital may be reached at the following address:

Loft Orbital Solutions Inc.
 321 11th Street
 San Francisco, CA 94103

Foundation Funds Organizational Chart

