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May 27, 2025

Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Subject: ITU Cost Recovery Fees for Updates to the Planet Pelican Satellite Network
USASAT-30R-2 Operating in Non-geostationary Orbit

Dear Ms. Dortch:

Planet Labs PBC (Planet) is aware that in accordance with Resolution 88 of the International Telecommunication Union's (ITU) Plenipotentiary Conference (Marrakech, 2002), and ITU Council Decision 482, as modified, cost-recovery fees will apply to satellite network filings received by the Radiocommunications Bureau after November 7, 1998. As a consequence, Commission applicants are responsible for any and all fees charged by the ITU to process their satellite network filings. Planet hereby states that it is aware of this requirement and unconditionally accepts all cost recovery responsibilities associated with the ITU filings for its USASAT-30R-2 Pelican satellite network update. Please address all cost-recovery inquiries, and ITU correspondence and filings, related to the Pelican satellite network to the following points of contact. Should there be any change in the point of contact information, Planet will inform the Commission within 30 days.

Danielle J. Piñeres
Deputy General Counsel & Vice President – Regulatory Affairs & Policy
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With a copy to:
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Planet understands that it must remit payment of any resultant cost-recovery fee to the ITU by the due date specified in the ITU invoice, unless an appeal filed prior to the due date is pending with the ITU. We fully understand that a license granted in reliance on such a commitment will be conditioned upon discharge of any such cost-recovery obligation. We also acknowledge that, in accordance with 47 C.F.R. §25.111, should we have an overdue ITU cost-recovery fee and have no appeal pending with the ITU, the Commission may dismiss any application associated with that satellite network.

Sincerely,

/s/ Danielle J. Piñeres

Danielle J. Piñeres
Deputy General Counsel & Vice President,
Regulatory Affairs & Policy
Planet Labs PBC