

Request for Special Temporary Authority

Planet Labs Inc. (“Planet”) hereby requests special temporary authority (“STA”) for 30 days,¹ beginning on March 14, 2017, to modify Condition 8 of the Planet satellite license² and allow all satellites in the Planet constellation to communicate in the 8025-8400 MHz band on a temporary basis with the Kongsberg Satellite Services (“KSAT”) ground stations in Troll, Antarctica and Punta Arenas, Chile.³ On February 15, 2017, Planet successfully launched 88 Dove satellites into orbit.⁴ As a result of this increase in the number of satellites, Planet requires additional downlink capacity, beyond the capability of its current ground station network, to support the transmission of imaging data from its 132-satellite constellation.

Planet is currently in the process of obtaining a license for an earth station in Inuvik, Canada, which will be used long term to support the additional downlink capacity needs.⁵ Unfortunately, the process has been delayed. Planet will not be able to obtain the necessary Canadian license or coordinate use of that station with the required U.S. agencies in a timely manner.

The International Bureau (“Bureau”) has previously found that the grant of STAs permitting earth stations to communicate with satellites pending the processing of permanent applications serves the public interest, convenience, and necessity by allowing for the deployment of new and additional satellite services in a timely manner.⁶ Further, Planet has commenced coordination for the temporary use of the KSAT ground stations with the relevant U.S. federal agencies and expects completion prior to the requested STA commencement date.⁷ Accordingly, Planet requests that the Bureau expeditiously grant this STA.

¹ See 47 C.F.R. § 25.120(b)(4).

² See Stamp Grant, IBFS File No. SAT-MOD-20150802-00053 at Condition 8 (granted Sept. 15, 2016) (limiting transmissions in the 8025-8400 MHz band to certain ground stations) (“Planet License”).

³ With respect to the operations in the 8025-8400 MHz frequency band, the technical characteristics of the Troll, Antarctica and Punta Arenas, Chile ground stations are similar to Planet’s Maddock, North Dakota ground station. See IBFS File No. SES-LIC-20150120-00021 (granted Sept. 30, 2015). Attached as Exhibit A is a chart of the relevant technical information for the requested operations in the 8025-8400 MHz band for the two KSAT ground stations. Although not relevant to this application, the ground stations will also communicate with the Planet satellites in the S-band frequencies.

⁴ See Glenn Fleishman, *Planet Labs Goes for Record 88-Satellite Launch*, AIRSPACEMAG.COM (Feb. 14, 2017), <http://www.airspacemag.com/daily-planet/planet-labs-goes-record-88-satellite-launch-180962178/>.

⁵ In accordance with its licensing condition, Planet intends to file a modification application to allow for transmissions in the 8025-8400 MHz band to the Inuvik ground station. See Planet License at Condition 8.

⁶ See, e.g., Stamp Grant, Spire Global, Inc., SES-STA-201660324-00292 to 00294 (granted Apr. 19, 2016); Stamp Grant, DG Consents Sub, Inc., SES-STA-20140717-00605 (granted Aug. 12, 2014); Stamp Grant, EchoStar Broadcasting Corporation, SES-STA-20130108-00019 (granted Jan. 10, 2013).

⁷ In the event that coordination with the relevant U.S. federal agencies for the temporary use of the KSAT ground stations is not completed by March 14, 2017, and the grant of the STA is conditioned on that coordination, Planet requests that the term of this STA not begin until after the coordination is completed.

Exhibit A
Earth Station Information

| Site Address | Latitude/ Longitude | Number of Antennas | Manufacturer | Diameter (m) | Peak Gain (dBi) | 3dB Beamwidth (deg) | Polarization |
|--|---|-----------------------------------|---------------------|-------------------------|----------------------------|------------------------------------|---------------------|
| Troll Research Station, Jutulsessen, Queen Maud Land, Antarctica | 72°0'45.08"S/ 2°31'56.06"E (-72.012522/ 2.532239) | 2 | Orbital Systems | 3.7m | 48 | 0.67 | RHCP |
| Route 9 North, km. 28 Punta Arenas, Chile | 52°56'17.16"S/70°51'25.92"W (-52.9381/ -70.8572) | 1 | ViaSat | 7.3m | 54 | 0.23 | RHCP |