

## EXHIBIT A - NARRATIVE STATEMENT

Terra Bella Technologies Inc. (Terra Bella), a wholly owned subsidiary of Planet Labs Inc. (Planet), pursuant to Section 25.120 of the Federal Communications Commission's (FCC's or Commission's) Rules, 47 C.F.R. § 25.120, hereby requests Special Temporary Authority (STA) for short-term modification of the telemetry downlink frequencies on two commercial remote sensing satellites, SkySat-14 and SkySat-15, while they are brought into service after launch. The satellites are scheduled to be launched on September 30, 2018 on a SpaceX Falcon 9 launch vehicle as previously authorized by the commission<sup>1</sup>. Approval for this STA application would be consistent with a previous Commission action in 2016 and 2017 for similar STA's with an identical purpose for Skysat-4 through Skysat-7<sup>2</sup> and Skysat-8 through Skysat-13<sup>3</sup>.

To accommodate possible launch delays, Terra Bella seeks temporary authority for a period of 180 days commencing on the expected launch date (September 30, 2018). The requested temporary authority, however, would be utilized only until routine communications links with the satellites are established, which is expected to be a period of no more than 60 days after launch. Terra Bella outlines below its need for the requested STA and the reasons that this request should be granted expeditiously.

Terra Bella (through its parent company Planet) currently operates thirteen commercial remote sensing satellites, SkySat-1 through SkySat-13, under FCC Call Sign S2862, as part of a non-geostationary orbit (NGSO) Earth Exploration Satellite Service (EESS) high-resolution imagery satellite system<sup>4</sup>. The requested STA would apply to SkySat-14 and SkySat-15, which are expected to be launched in September 2018.

On the launch date, SkySat-14 and SkySat-15 will be released by the launch vehicle in a cluster that is so closely spaced that ordinary telemetry transmissions from the different satellites—which will use the same frequencies—would be indistinguishable at earth stations for the first few days on-orbit. To facilitate the identification and monitoring of each individual satellite, Terra Bella therefore requests authority to temporarily modify the telemetry downlink frequency (Channel ID TTC1) for each of the new satellites to a frequency that is unique but close to the frequency authorized for operations under Call Sign S2862. Without the requested temporary modification, both satellites could be transmitting at the same time, on the same frequency, and thus interfering with each other.

Specifically, Terra Bella requests authority to assign each of the two new satellites one of the following frequencies for telemetry transmissions effective upon launch:

- 8374.75 MHz
- 8375.25 MHz

Each of the proposed frequencies is within the 8025-8400 MHz band allocated to EESS, as well as within 250 kHz of the telemetry downlink frequency of 8375.00 MHz currently authorized for Call Sign S2862. Assuming nominal conditions, after approximately 30 to 60 days, the satellite orbits will have diverged enough so that the earth stations are able to distinguish each individual satellite. At that time, the satellites will be commanded to transmit on the licensed frequency of 8375.00 MHz for permanent operations.

---

<sup>1</sup> File number SAT-MOD-20150408-00019, granted August 31, 2016.

<sup>2</sup> File number SAT-STA-20160803-00076, granted Sept 14, 2016.

<sup>3</sup> File number SAT-STA-20170726-00109, granted Oct 12, 2017.

<sup>4</sup> File number SAT-LOA-20120322-00058 (SkySat-1 and SkySat-2) and File No. SAT-MOD-20150408-00019 (SkySat-3 through 15).

Terra Bella incorporates by reference all of the technical showings it made in the license modification application (both on Form 312, Schedule S, and in Exhibit 43)<sup>5</sup>, and confirms that operation under this STA will not vary from such parameters with the exception of narrowband telemetry signals identified herein. The temporary frequencies would be no less compatible with other satellite missions than the licensed frequency, since they are narrowband and in close proximity to the currently authorized telemetry downlink frequency of 8375.00 MHz. There would also be no changes to other parameters currently authorized for operations under Call Sign S2862, including modulation, bandwidth, and power of the telemetry transmitters.

Grant of this STA will serve the public interest by facilitating Planet's operation of two additional, high-resolution imagery satellites that are complementary to the existing satellites, SkySat-1 through Skysat-13, thereby enhancing competition and expanding U.S. capabilities in the market for commercial remote sensing data. Planet's innovative approach—using small, lightweight, and low-cost satellites—allows the company to meet the growing demand for high resolution imagery in a cost-effective, timely manner, and deployment of the proposed satellites will further enhance Planet's EESS capabilities.

In summary, and on the basis of the information provided herein and in File No. SAT-MOD-20150408-00019, Terra Bella requests special temporary authority to modify the telemetry downlink frequencies on two commercial remote sensing satellites, SkySat-14 and SkySat-15, for a period of 180 days commencing on the expected launch date of September 30, 2018.

---

<sup>5</sup> Ibid footnote 1.