

## **EXHIBIT A - NARRATIVE STATEMENT**

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 six commercial remote sensing satellites, SkySat-16 to SkySat-21, while they are brought into service after launch. The satellites are intended to be launched as secondary payloads on two separate Falcon 9 launch vehicles: (1) April 1, 2020 for SkySat-16 to SkySat-18, and (2) June 1, 2020 for SkySat-19 to SkySat-21. These satellites were previously authorized by the Commission<sup>1</sup>, with a request to modify the orbital location now before the Commission.<sup>2</sup> Approval for this STA application would be consistent with previous Commission actions in 2016, 2017, and 2018 for similar STA's with an identical purpose for Skysat-4 to Skysat-7<sup>3</sup>, Skysat-8 to Skysat-13<sup>4</sup>, and SkySat-14 to SkySat-15<sup>5</sup>.

To accommodate possible launch delays, Planet seeks temporary authority for a period commencing on the first intended launch date (April 1, 2020), and extending 180 days afterward. 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 each launch.

### **Planet Justification for Special Temporary Authority (STA)**

Planet currently operates fifteen commercial remote sensing satellites, SkySat-1 to SkySat-15, under FCC Call Sign S2862, as part of a non-geostationary orbit (NGSO) Earth Exploration Satellite Service (EESS) high-resolution imagery satellite system<sup>6</sup>. The requested STA would apply to SkySat-16 to SkySat-21, which, again, are expected to be launched in April and June of 2020.

For each launch, SkySat-16 to SkySat-18 and SkySat-19 to SkySat-21 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, Planet 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, all six satellites could be transmitting at the same time, on the same frequency, and thus interfering with each other.

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<sup>1</sup> File number SAT-MOD-20170317-00053, granted June 26, 2018.

<sup>2</sup> File number SAT-MOD-20191217-00148, filed Dec 17, 2019.

<sup>3</sup> File number SAT-STA-20160803-00076, granted Sept 14, 2016.

<sup>4</sup> File number SAT-STA-20170726-00109, granted Oct 12, 2017.

<sup>5</sup> File number SAT-STA-20180724-00055, granted September 13, 2018.

<sup>6</sup> File number SAT-LOA-20120322-00058 (SkySat-1 and SkySat-2) and File No. SAT-MOD-20150408-00019 (SkySat-3 through 15).

Specifically, Planet requests authority to assign the six new satellites one of the following frequencies for telemetry transmissions effective upon launch:

- 8374.25 MHz
- 8374.50 MHz
- 8374.75 MHz
- 8375.25 MHz
- 8375.50 MHz
- 8375.75 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.

Planet 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>7</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 will 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 six additional, high-resolution imagery satellites that are complementary to the existing satellites, SkySat-1 to Skysat-15, 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-20191217-00148, Planet requests special temporary authority to modify the telemetry downlink frequencies on six commercial remote sensing satellites, SkySat-16 to SkySat-21, for a period commencing on the first intended launch date (April 1, 2020) and extending 180 days afterward.

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<sup>7</sup> Ibid footnote 2.