

EXPLANATORY STATEMENT

As explained in its concurrently filed modification application, R2 Space, Inc. (“R2 Space”) was granted authority on December 18, 2020 to launch XR-1, the initial satellite in its XR Earth-Exploration Satellite Service network. *See* FCC Public Notice, Satellite Policy Branch Information: Actions Taken, Report No. SAT-01518, DA No. 20-1502 (IB, rel. 12/18/2020), at 2 (grant issued in part/deferred in part in FCC File No. SAT-LOA-20200511-00042, Call Sign S3067). This partial grant of its application specified a telecommand uplink receive channel utilizing 128 kHz of bandwidth at 2086.736-2086.864 MHz (i.e., with the center frequency at 2086.8 MHz). Shortly thereafter, consistent with the condition on the license grant, R2 Space submitted to the FCC advance publication information for the XR-1 satellite specifying a slightly different 128 kHz channel at 2086.836-2086.964 MHz (center frequency at 2086.9 MHz). The information contained in the API is correct. Accordingly, R2 Space has submitted a modification application to correct the telecommand uplink receive channel specified in its license to instead reflect the correct 2086.836-2086.964 MHz included in the API. No other changes to the license are required in the modification.

Currently, the satellite is being operated during its in-orbit testing phase by ICEYE (ICEYE also holds an EESS license that is issued by the Finnish administration). Both parties are anxious for the XR-1 satellite to be transferred to R2 Space to commence operations under its U.S. license. Currently, the principal impediment to the handover is the discrepancy in the telecommand uplink. Accordingly, to allow this step to occur in the very near term and for U.S. operations to commence consistent with the API submitted to the ITU, R2 Space requests special temporary authority (“STA”) effective Tuesday, April 20, 2021 to receive telecommand transmissions at 2086.836-2086.964 MHz.

Under Section 25.120(b)(1) of the FCC’s Rules, the International Bureau may grant an STA when the public interest supports the relief requested, and/or delay in the institution of temporary operations would be contrary to the public interest. *See* 47 C.F.R. § 25.120(b)(1). Such authority may be granted for a period not to exceed 60 days where the applicant has filed a request for permanent authority for the parameters and facilities requested. *See* 47 C.F.R. § 25.120(b)(3). This is the case here, where R2 Space has filed an application to modify its license to specify the corrected telecommand uplink channel.

Grant of the requested STA will promote the public interest by permitting R2 Space to initiate its operations using a license that was granted four months ago and utilize a receive frequency consistent with the API that the FCC has already submitted to the ITU. The requested revision does not alter R2 Space's transmit authority, but merely adjusts the receive channel to be utilized for the telecommand uplink from Earth stations already authorized to transmit in this S-band frequency range. Accordingly, grant of the authority requested is consistent with Commission policy and will not adversely affect other authorized operations. R2 Space acknowledges that any action taken pursuant to a grant of the requested STA will be at its own risk, and respectfully requests that the FCC grant it authority commencing on or about Tuesday, April 20, 2021, for a period of sixty (60) days, to use the requested telecommand uplink channel.