

## **EXPLANATORY STATEMENT**

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). As explained in its modification application filed on April 15, 2021 (IBFS File No. SAT-MOD-20210415-00050), the partial grant 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 after the grant was issued, consistent with the condition on the license, 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), consistent with the manufactured satellite it purchased from ICEYE. The information contained in the API is correct. Accordingly, R2 Space has submitted its pending 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.<sup>1</sup>

R2 Space was granted Special Temporary Authority on April 30, 2021 to operate using the correct telecommand channel. *See* IBFS File No. SAT-STA-20210415-00051 (granted 4/30/2021). This STA has since been extended for additional periods of sixty days in IBFS File Nos. SAT-STA-20210628-00084 (granted 7/15/2021) and SAT-STA-20210826-00112 (granted 9/10/2021). By this application, it seeks extension of this authority for an additional 60 days commencing November 10, 2021.

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

---

<sup>1</sup> R2 Space previously requested that the International Bureau defer final action on the telecommand portion of the pending modification application so that the application could be amended to add a wider X-band channel that is within the XR-1 satellite’s design capability and to make other technical corrections. R2 Space filed that amendment on October 25, 2021. *See* IBFS File No. SAT-AMD-20211025-00134. It now seeks partial grant of the portion of this amended application relating to the telecommand link that is the subject of this STA request.

license to specify the corrected telecommand uplink channel and has been operating the specified telecommand channel on this correct frequency since it began operating the satellite in early May 2021.

Grant of the requested STA extension will promote the public interest by permitting R2 Space to maintain its operations using a license that was granted nearly eleven months ago, utilizing the correct receive frequency consistent with the API that the FCC submitted to the ITU. Accordingly, grant of the STA extension 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 extension will continue to be at its own risk, and respectfully requests that the FCC grant it authority commencing on or about Wednesday, November 10, 2021, for a period of sixty (60) days, to use the requested telecommand uplink channel.