

APPLICATION FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

Iridium Constellation LLC (“Iridium”) hereby requests an additional thirty days of special temporary authority (“STA”)¹ to store the newly launched spare satellites associated with its “Big LEO” band non-geostationary satellite orbit (“NGSO”) Mobile-Satellite Service constellation (Call Sign S2110), in an expanded altitude range between 615 and 760 km.²

Iridium sought and received special temporary authority to maintain the spares at this expanded altitude range and, on May 20, 2023, successfully launched the five second generation spare satellites.³ In accordance with the existing grant of STA, Iridium placed four spares in storage orbits at altitudes between approximately 615 km and 650 km and one spare in a storage orbit at approximately 760 km. These storage orbits were selected based on contemporaneous conditions. Iridium may reposition the five spares in storage orbits at altitudes between 615 km and 760 km in response to operational considerations or space traffic conditions.⁴

Continuing to maintain the second-generation satellites in the requested storage orbits will serve the public interest by increasing the number of readily deployable in-orbit spares, conserving fuel, and optimizing spare satellite configuration, thereby ensuring continuity of

¹ See 47 C.F.R. § 25.120(a).

² See *Iridium Constellation LLC, Application for Modification of License to Authorize a Second-Generation NGSO MSS Constellation*, Order and Authorization, 31 FCC Rcd. 8675 (Aug. 1, 2016).

³ See *Iridium Constellation LLC, Application for Special Temporary Authority*, Stamp Grant, File No. SAT-STA-20230516-00110 (May 18, 2023). See also *Iridium Adds to Constellation Resilience with Launch of Spare Satellites*, Iridium, Press Release (May 20, 2023), <https://investor.iridium.com/2023-05-20-Iridium-Adds-to-Constellation-Resilience-with-Launch-of-Spare-Satellites>.

⁴ Iridium plans to file a modification application seeking permanent authority to operate the five spares at the altitudes discussed herein.

service for Iridium's end users and enabling the replacement process in a manner that coordinates satellite movements safely and efficiently.⁵

Consistent with Section 1.62 of the Federal Communications Commission's ("Commission" or "FCC") rules, Iridium will continue storing the spares pursuant to the terms and conditions of its expiring STA until such time as the Commission makes a determination with respect to this request or with respect to the Spare Satellite Modification Application, whichever comes first.⁶ The altitudes of the five spare satellites pose a low conjunction risk because they are not populated with other large commercial NGSO systems. Iridium, moreover, will continue to take all practicable steps to ensure safe operation of its spacecraft and maintain space situational awareness. Iridium will continue to coordinate with and provide operational information to other operators and the 19th Space Defense Squadron to further ensure space safety.

For the reasons set forth herein, Iridium respectfully requests that the Commission grant this further STA extension request.

⁵ See *Issues Related to Allegations of Warehousing and Vertical Foreclosure in the Satellite Space Segment*, Notice of Inquiry, 28 FCC Rcd 8571, ¶ 11 (2013) ("[W]e recognize the importance of affording operators some flexibility in managing their satellite fleets in a manner that best serves their business and customer needs.").

⁶ 47 C.F.R. § 1.62.

Respectfully submitted,

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