

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

BlackSky Global LLC (“BlackSky”), pursuant to Section 25.120 of the Commission’s rules,¹ hereby requests Special Temporary Authority (“STA”) for permission for an initial period of sixty (60) days to operate remaining satellites in BlackSky’s Gen-2 constellation at altitudes down to 340 kilometers. The requested altitude range is below the minimum orbital altitudes authorized in BlackSky’s current constellation license,² which are 385 kilometers or 440 kilometers, depending on the satellite.

Several of BlackSky’s Gen-2 satellites are approaching their lowest currently permitted altitude, and three are already subject to an existing STA.³ This request for an STA is intended to provide a comprehensive, short-term response to the planned downward trajectory of BlackSky’s satellites, while avoiding the need to file separate STAs for individual satellites or pairs of satellites. As a longer-term solution, BlackSky has submitted a pending request to modify its grant to allow operation of its Gen-2 satellites down to 340 kilometers.⁴

As set forth below:

- The matter is urgent.
- There would be no interference to third parties.⁵
- There would be no increase in the risk of orbital debris, including to the International Space Station.

¹ 47 C.F.R. §25.120.

² FCC Call Sign S3032, ICFS File Nos. SAT-MOD-20211230-00205 and SAT-AMD-20220805-00078 (“Grant”). BlackSky’s Grant also includes authorization for BlackSky’s Gen-3 satellites. BlackSky is not requesting an STA with respect to its Gen-3 satellites.

³ BlackSky requested and was granted several STAs to operate Global-4 down to an altitude of 400 km (See SAT-STA-20250822-00223, SAT-STA-20250918-00289, SAT-STA-20250926-00306, SAT-STA-20251118-00326, and SAT-STA-20251219-00392), with the most recent STA grant ending January 26, 2026. As Global-4 continued to descend, BlackSky separately requested and has been granted a series of STAs to operate Global-4 down to an altitude of 340 km, with the first such STA beginning January 20, 2026, and the most recent STA effective through Aug 19, 2026. (See SAT-STA-20260709-00283, SAT-STA-20260608-00231, SAT-STA-20260511-00193, SAT-STA-20260408-0015, SAT-STA-20260310-00117, SAT-STA-20260129-00062, and SAT-STA-20250925-00301.) BlackSky was also recently granted STA to operate Global-10 and Global-13 down to an altitude of 340 km. (See, *Stamp Grant*, BlackSky Global LLC, SAT-STA-20260617-00244 (granted Aug. 5, 2026).)

⁴ See SAT-MOD-20260626-00258.

⁵ BlackSky has previously attempted to pre-coordinate its STA requests with federal agencies but was told that such pre-coordination is no longer being conducted.

- Allowing continued operation of the satellites will serve the public interest by maintaining services from these satellites in areas of crucial significance to BlackSky's customers, including the U.S. government.

I. Emergency

Timing is urgent. The Global-8⁶ and Global-12 satellites [REDACTED]. [REDACTED]. BlackSky estimates these two satellites will drop below 385 kilometers as soon as late September and early October, 2026, respectively. Similarly, three other satellites (Global-7, Global-11, and Global-14) [REDACTED] are currently projected to descend below 385 kilometers by mid- to late-January, and in a worst-case scenario as early as mid-December. The exact date by which the orbits of these satellites will reach 385 kilometers is unknown due to uncertainty around atmospheric drag and the effects of solar activity.

BlackSky originally did not seek authority to operate at altitudes down to 340 kilometers because initial pre-operational analysis pointed to altitudes of 385 to 400 kilometers as the limit of satellite operational stability due to atmospheric drag, disturbance torques, gravity gradient, and other factors. However, BlackSky's experience under prior STA grants in operating multiple other Gen-2 satellites down to 340 kilometers has demonstrated its ability to maintain momentum management and attitude control of the spacecraft at lower altitudes. Taking into account this operational experience and BlackSky's engineering analysis based upon this experience, BlackSky is confident that it can operate all its remaining Gen-2 satellites as they descend below 385 kilometers while maintaining necessary stability at least until they reach the new requested minimum altitude of 340 kilometers.

In addition, BlackSky's Gen-2 satellites have proven to have longer operational lifetimes than initially anticipated. [REDACTED], these satellites continue to provide high-quality imagery that is highly valuable to the United States government and other BlackSky customers.

⁶ BlackSky notes that there is a separate reference in the current Grant that would permit "Global 8" to operate down to an altitude of 340 kilometers, but not at its current inclination. BlackSky believes that this reference dates to an earlier STA that was granted for a different BlackSky satellite that has since demised (its sixth satellite to launch, but with the BlackSky tail number "Global 8").

II. Frequency Considerations

As demonstrated below, BlackSky's proposed operations below 385 km should not raise interference concerns. If needed, however, BlackSky also notes below further steps it could take to avoid any possibility of concern.

For X-band downlink, though BlackSky's current license would permit it to operate at an Effective Isotropic Radiated Power (EIRP) of up to 23.2 dBW, its Gen 2 satellites can control their transmit power in 1dB increments down to 16.2dBm and nominally downlink at a power of 19.2dBW or lower, depending on the Earth Station and in accordance with BlackSky's pre-existing frequency coordination with NASA. This coordination includes a schedule of power reductions at each site, which is referenced in our current grant in condition 19:

Therefore, BlackSky shall continue to implement these techniques on the Gen-2 constellation and shall decrease power further for the Gen-2 satellites commensurate with the altitude decrease.

As BlackSky's satellites decrease in altitude, they will correspondingly increase their distance from the geostationary satellite belt, so their PFD in that direction will be reduced and, therefore, will be well within the compliance showing demonstrated by BlackSky in its original license application.

As to BlackSky's UHF downlink, while it does not have the ability to adjust power as the satellites descend, the increase in PFD to the earth (from 385 km) will not exceed 1.1 dB at the lowest altitude (340 km) for which operation is requested. Furthermore, the use of these frequencies will be exceedingly limited because the satellites are far beyond the LEOP stage. The PFD at other satellites in higher altitude orbits will naturally decrease as separation increases. BlackSky will transmit on UHF frequencies only when over the limited number of mid-inclination earth stations for which transmissions are intended and at a 5% average duty cycle. These factors make the chances of any increase in potential interference exceedingly remote. The availability of multiple UHF channels in the band that could be switched with other satellites in the constellation that operate at higher altitudes gives BlackSky additional flexibility to avoid any potential interference.

As BlackSky's satellites descend, simply as a matter of geometry, the geographic scope of their transmit beams also narrow and, therefore, fall within the broader scope of the beams presented in the application underlying BlackSky's current grant.

Altitude (km)	EIRP (dBW)
385+	19.2
344 - 384	18.2
340 - 343	17.2

III. Orbital Debris

Similarly, continued operation of BlackSky's Gen-2 satellites will have no detrimental effect on the mitigation of orbital debris considerations that were presented in BlackSky's license application. BlackSky's orbital debris mitigation plan is, and has always been, that its satellites will descend to the earth by force of gravity after exhaustion of propulsion capability. This request maintains the propulsion and orbital demise concept of operations for the Gen-2 satellites.

BlackSky's ability to perform necessary end-of-life activities, as required under Section 25.283(c) of the Commission's rules, does not require remaining propellant aboard the satellite. BlackSky retains the ability to fully comply with the requirements for de-energizing the satellites at all altitudes down to 340 kilometers. [REDACTED]

BlackSky maintains a conjunction deconfliction agreement with NASA for coordination of operations in and around the International Space Station (ISS). During these overlaps, coordination between BlackSky and NASA has operated effectively for conjunction avoidance. Upon altitude reduction below 385km as requested, the satellites will leave the altitude of overlap with the ISS and decrease any chance of conflict or orbital debris impacting the ISS mission.

III. Coordination with other Federal Agencies

BlackSky has previously initiated coordination with NTIA and other federal agencies (NOAA, NASA, and DOD) to confirm that its proposed operations below 385 kilometers will not interfere with federal operations.

Notably, BlackSky's NOAA license currently allows operation of all Gen-2 "Global" satellites down to an altitude of 300 km.

IV. Public Interest Considerations

The premature loss of coverage from its Gen-2 satellites would constrain BlackSky's ability to provide service at a time when extensive and timely imaging is most essential to its customers' programs, including programs of the US Government. Allowing BlackSky to continue operating these satellites [REDACTED] [REDACTED] will extend the company's ability to support the US government and other customers, and will therefore strongly serve the public interest.

The public interest will be further served by shortening the period between the decommissioning of BlackSky's Gen-2 satellites and their demise into the atmosphere. That is, since the operational mission of these satellites will be extended as they descend below their originally authorized lowest operating point, the post-mission orbital lifetime of the satellites will be commensurately shortened.

V. Conclusion

Accordingly, for good cause as shown herein, BlackSky requests that the Commission grant BlackSky's STA request.