

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	)	File No. SAT-STA-20260914-00368
	)	
Planet Labs PBC	)	Call Sign S2912
	)	
Request for Special Temporary Authority	)	

Narrative

Planet Labs PBC (“Planet”), pursuant to Section 25.120 of the rules of the Federal Communications Commission (“FCC” or “Commission”), 47 C.F.R. § 25.120(b)(4), seeks special temporary authority (“STA”) for a period of 30 days starting October 1, 2026, to operate 18 new Flock satellites (Call Sign S2912), expected to launch in early October, using Planet’s legacy Flock uplink UHF channel centered at 450.0 MHz during launch and early operations (“LEOP”), if needed, as a back-up to the new Flock UHF uplink channel at 450.1 MHz.

Planet has long operated its Flock UHF uplink channel at 450.0 MHz. In order to promote improved coexistence with federal systems, when Planet sought authorization to launch an additional 200 Flock satellites, it requested authorization to use a channel centered at 450.1 MHz instead.¹ On January 30, 2026, the Commission granted authorization to launch the additional 200 Flock satellites and operate them (and existing, on-orbit Flock satellites, where

¹ See ICFS File No. SAT-MOD-20231031-00269; SAT-AMD-20250130-00033 (granted Jan. 30, 2026).

possible²) with a UHF uplink channel centered at 450.1 MHz.³ Although Planet intends to operate the new Flock satellites at 450.1 MHz,⁴ it requests STA to use the 450.0 MHz legacy channel as a back-up frequency, if needed, to support these 18 Flock satellites during LEOP. It is unlikely that the back-up frequency will be needed. However, Planet is requesting this 30-day STA out of an abundance of caution to provide its operations team flexibility during the LEOP phase because: (1) this is the first batch of Flock satellites configured to operate at 450.1 MHz; and (2) Planet is still in the process of securing the full complement of ground station licenses worldwide to support the new 450.1 MHz channel.

Communications on the 450.0 MHz channel will be consistent with the technical parameters and conditions in the relevant space station authorization that apply to the legacy authorized 450.0 MHz Flock operations. Because this is a small batch of satellites and Planet's current on-orbit Flock satellites already use the 450.0 MHz channel, impact to other users of the band is not expected even if Planet were to revert to 450.0 MHz as a back-up.

² Planet intends to update its on-orbit Flock satellites to operate on 450.1 MHz where possible. However, as discussed with federal spectrum managers, Planet will continue to operate its existing, on-orbit fleet on 450.0 MHz in the event those satellites are unable to change operational frequencies. This will allow Planet to continue to conduct UHF ranging on those satellites for the purpose of providing the most accurate ephemeris data regarding the location and trajectory of its satellites through their demise.

³ See ICFS File No. SAT-MOD-20231031-00269; SAT-AMD-20250130-00033 (granted Jan. 30, 2026).

⁴ Planet and USEI have also sought earth station modifications and special temporary authority for 450.1 MHz for the relevant U.S. ground station locations. See ICFS File No. SES-MOD-20260604-01579 (granted Sept. 8, 2026); ICFS File No. SES-MOD-20260805-02173 (filed Aug. 12, 2026); ICFS File No. SES-MOD-20260805-02174 (filed Aug. 12, 2026); ICFS File No. SES-STA-20260901-02470 (filed Sept. 1, 2026); ICFS File No. SES-STA-20260901-02469 (filed Sept. 1, 2026); ICFS File No. SES-MOD-20260831-02456 (filed Sept. 1, 2026); ICFS File No. SES-MOD-20260831-02455 (filed Sept. 1, 2026); ICFS File No. SES-STA-20260901-02474 (filed Sept. 1, 2026); ICFS File No. SES-STA-20260901-02473 (filed Sept. 1, 2026).

For the reasons set forth above, and in order to have authorization in place prior to early October launch, Planet respectfully requests expeditious grant of this STA request.

Respectfully submitted,

/s/ Danielle J. Piñeres

Danielle Piñeres
Deputy General Counsel & VP of
Regulatory Affairs & Policy
Planet Labs PBC
645 Harrison Street, Floor 4
San Francisco, CA 94107

September 14, 2026