

FCC Form 312
Universal Space Network, Inc.
Public Interest Statement

Universal Space Network, Inc. (“USN”) respectfully submits that it is in the public interest to grant USN the authority to operate a transmit/receive earth station transmitting in the 2025-2110 MHz band (“S-band”).

USN seeks authorization to transmit in the S-band for purposes of communicating with the Earth Exploration Satellite Service (“EESS”), nongeostationary orbit (“NGSO”) earth imaging satellites known as WorldView-1 and WorldView-2. The satellites are operated by DigitalGlobe, Inc. (“DigitalGlobe”). USN will use the earth station to provide critical telemetry, tracking and control (“TT&C”) operations and a data reception facility. The station will receive signals in the 8025-8400 MHz band (“X-band”).

In the U.S. Table of Frequency Allocations, the 2025-2110 MHz band is allocated to non-government systems operating in the EESS for earth to space transmission.¹ U.S. Footnote 347 of the U.S. Table of Frequency Allocations states:

In the band 2025-2110 MHz, non-Government Earth-to-space and space-to-space transmissions may be authorized in the space research and Earth exploration-satellite services subject to such conditions as may be applied on a case-by-case basis. Such transmissions shall not cause harmful interference to Government and non-Government stations operating in accordance with the Table of Frequency Allocations.²

The Commission has authorized similar requests for non-government EESS services in this band.³ Specifically, the Commission has authorized DigitalGlobe’s system as a point of communication for other earth station facilities similar to that requested here.⁴ In order to ensure compatibility with potential nearby terrestrial users, USN has completed the coordination process for the proposed operations in the S-band pursuant to Section 25.203(c) of the Commission’s Rules. USN has attached its coordination report at Exhibit B to this Application. The report shows no cases of interference.

USN respectfully submits that the authorization of its proposed S-band TT&C operation is in the public interest. The Commission has determined that the operation of DigitalGlobe’s EESS satellite system serves the public interest by “enhanc[ing] national security,

¹ See DigitalGlobe, Inc. Modification of Authorization to Construct, Launch and Operate a Remote-Sensing Satellite System, File No. STA-MOD-20040728-00151, Order and Authorization, DA 05-2640 at ¶ 17 (rel. Sept. 30, 2005) (“*WorldView Authorization*”), modified by File No. SAT-MOD-20070730-00107.

² 47 C.F.R. § 2.106 n.US347.

³ See, e.g., IBFS File No. SES-LIC-20000320-00417, Call Sign E000150 (granted Jan. 02, 2001).

⁴ See, e.g., IBFS File No. SES-LIC-20040607-00808, Call Sign E040264 (granted Nov. 23, 2004), as amended and modified.

environmental monitoring and forecasting functions.”⁵ USN will conduct its TT&C operation on a non-harmful interference basis with respect to all other systems operating on a primary or secondary basis, in accordance with the requirements of 47 C.F.R. §2.106 and the U.S. Table of Frequency Allocations. USN’s proposed earth station will be limited to a single transmit frequency and will operate at a low power level. The proposed site is not in the line-of-sight of any major TV market, and as Exhibit B demonstrates, there is no reported potential interference conflict. To address any remaining interference concerns USN is open to conducting tests with any shared users that operate receive systems within the contours of this site.

⁵ See WorldView Authorization at ¶ 1.