

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of	)	
	)	
Skylo Technologies, Inc.	)	ICFS File Nos. SES-MOD-_____
	)	
Application to Modify Earth Station License	)	Call Sign: E210107
to Add New Frequencies and New Mobile	)	
Earth Station Class	)	
	)	

APPLICATION TO MODIFY LICENSE

Skylo Technologies, Inc. (“Skylo”), pursuant to 47 C.F.R. § 25.117, respectfully requests that the Space Bureau (“Bureau”) modify the company’s mobile earth station (“MES”) blanket license¹ in the mobile satellite service (“MSS”) to authorize a baseline license for the following:

- operations in the 1610-1618.725 MHz (Earth-to-space) and 2483.5-2500 MHz (space-to-Earth) frequency bands; and
- a new MES class and associated new emission designators.

Skylo requests that this license modification be considered under streamlined processing, consistent with the FCC’s objectives in the baseline license order.² Grant of this application will add critical satellite capacity for Skylo to meet rapidly increasing consumer demand for direct to device (“D2D”) services, using globally allocated MSS spectrum to enable ubiquitous access to

¹ See Stamp Grant, Skylo Technologies Inc., ICFS File No. SES-LIC-20210505-00772 (granted Mar. 31, 2023); Stamp Grant, Skylo Technologies Inc., ICFS File Nos. SES-MFS-20230901-02046, SES-AMD-20240229-00656 (granted May 16, 2024); (together, “Skylo Blanket License”). The specific MSS frequency bands for which Skylo is authorized are as follows: L band: 1525-1559 MHz / 1626.5-1660.5 MHz and S band: 2000-2020 / 2180-2200 MHz.

² See 47 C.F.R. § 25.115(a)(5)(i); Expediting Initial Processing of Satellite and Earth Station Applications, Second Report and Order, 40 FCC Rcd 6443, 6444 ¶ 3 (2025) (“Baseline License Order”); Baseline License Order at 6446–48 ¶¶ 7-10.

non-terrestrial networks (“NTNs”) for emergency and safety services, messaging, and other MSS communications to smartphones and other devices such as wearables. Skylo hereby certifies that there are no changes to the currently licensed operations other than the modifications requested herein.

I. BACKGROUND

Skylo was founded to bridge coverage gaps allowing standard cellular devices to transmit signals via satellite when out of range of traditional cell towers. Skylo’s NTN MSS provides network components that seamlessly extend the cellular experience, ensuring continuous coverage if devices have a clear view of the sky. Currently, Skylo offers a real-time 24/7 D2D service, spanning five continents, authorized in 41 countries, covering over 75 million square kilometers and with more than 20 million activations.

Skylo’s service utilizes existing satellite infrastructure, primarily geostationary (“GEO”) satellites, though it is also compatible with low earth orbit (“LEO”) satellites. The current NTN service operates over dedicated, licensed MSS L- and S-band spectrum, enabling standard mobile phones, wearables, and IoT devices to connect directly to satellite infrastructure.

Skylo has various business models for service provision within the scope of this modification: it works directly with Mobile Network Operators (“MNOs”), Mobile Virtual Network Operators (“MVNOs”), or with original equipment manufacturers (“OEMs”). In the case of MNOs, Skylo utilizes globally recognized standards and interfaces developed by the 3rd Generation Partnership Project (“3GPP”) to integrate directly with an MNO’s core network, so that Skylo functions as a 3GPP compatible roaming partner.

With OEMs, in many cases, Skylo’s customers focus on the provision of emergency and safety communication services to end-users. In an emergency such as seasonal flooding, wildfires,

severe storms, hurricanes, maritime, backcountry or automobile accidents, affected users of a Skylo OEM partner can connect with first responders. In an MNO-led model, affected users can directly message their personal contacts using the Skylo NTN service when outside of coverage areas to seek emergency assistance or simply to maintain contact.

On March 31, 2023, the Commission granted Skylo a blanket authorization to operate up to one million MES to communicate with the Skyterra 1 and Inmarsat 4-F3 satellites, transmitting in the 1626.5-1660.5 MHz band and receiving in the 1525-1559 MHz band.³ Skylo's blanket authorization was then modified in May 2024 to add new classes of earth stations for a total of 5.7 million MES and two new satellite points of communication, Echostar T1 and DBSD G-1, with associated frequencies in the 1525-1559 MHz, 1626.5-1660.5 MHz, 2000-2020 MHz, and 2180-2200 MHz frequency bands.⁴ In April 2026, Skylo filed a notification of minor modification to increase its authorized unit counts up to 70 million MES across the three authorized MES classes operating in the MSS L-band and S-band in communication with the abovementioned satellite points of communication.⁵

By this application, Skylo now seeks Bureau approval to: (i) operate in the 1610-1618.725 MHz (Earth-to-space) and 2483.5-2500 MHz (space-to-Earth) frequency bands; and (ii) add a new MES class and associated new emission designators. Once Skylo designates a point of communication, grant of a baseline license in this case will allow Skylo to promptly commence operations under the Commission's streamlined modification procedures for baseline earth station licensees.

³ See Skylo Blanket License.

⁴ See *id.*

⁵ See Letter from Mindel De La Torre, Head of Global Regulatory Affairs, Skylo Technologies, Inc., to Marlene H. Dortch, Secretary, FCC, Call Sign E210107 (filed Apr. 27, 2026).

II. MODIFICATION REQUEST

a. Service Description

Skylo will support emergency, safety, and short-messaging data services, as well as other MSS communications in the 1610-1618.725 MHz (Earth-to-space) and 2483.5-2500 MHz (space-to-Earth) frequency bands using a burst mode packet data waveform. Grant of the blanket license modification will produce substantial benefits and further the public interest, convenience, and necessity.

b. Authorization to Add New Frequencies

Skylo requests authority to operate in the following frequencies for its NTN services:

Direction	Frequency Ranges (MHz)
Transmit (Earth-to-space)	1610-1618.725
Receive (space-to-Earth)	2483.5-2500

c. Authorization to Add a New MES Class

Skylo requests authority to add a new MES class (“ANT 4”) to its blanket license for operations. Specifically, Skylo seeks authority to operate up to 250 million units under the proposed ANT 4 category. ANT 4 will support emergency, safety, short-messaging data services and other MSS communications using a burst mode packet data waveform. Consistent with other blanket licenses, Skylo has specified the “Manufacturer” and “Model” designations as “Various” for ANT 4, rather than identifying a static group of manufacturers and terminal models, to provide flexibility in a dynamic equipment marketplace. Individual manufacturers and models under ANT 4 are identified in the equipment certification filings for these units. The technical specifications provided below and in the Schedule B of the FCC Form 312 encompass all of the MES models that will be operated under the ANT 4 category. All devices will comply with applicable technical

requirements and the Commission's rules. The proposed MES operations will avoid harmful interference to other licensed systems and services.

III. TECHNICAL SPECIFICATIONS

a. ANT 4 Antenna Characteristics

The ANT 4 terminal is equipped with two linearly polarized MSS transmit/receive antennas integrated in a single housing with the radio unit. These antennas will be fabricated by third party manufacturers.

Key characteristics of the ANT 4 device antenna are summarized in the table below:

Parameter	Transmit Antenna	Receive Antenna
Frequency	1610-1618.725 MHz	2483.5-2500 MHz
Polarization	Linear	Linear
Peak Gain	< 2.0 dBi	< 2.0 dBi
Elevation Plane Coverage	0 to 90 degrees	0 to 90 degrees
Azimuth Plane Coverage	360 degrees	360 degrees
Gain below 10° Elevation	< 2.0 dBi	< 2.0 dBi
Size	< 3"	< 3"

b. ANT 4 Antenna Height

The handheld form factor of ANT 4 makes Federal Aviation Administration notification unnecessary.⁶ The ANT 4 device is intended to be used as a handheld portable radio at roughly chest level approximately four to five feet above ground but will still operate if held higher or set down on a surface.

⁶ See 47 C.F.R. § 17.7(e)(3).

c. Emission Designators

The following emission designators are proposed for ANT 4:

Transmit (1610–1618.725 MHz)	Receive (2483.5–2500 MHz)
200KG1D	1M08G1D
230KG1D	
280KG1D	

d. Equivalent/Effective Isotropically Radiated Power (“EIRP”)

The following table summarizes the transmit power and antenna gain parameters for the proposed ANT 4 MES:

Parameter	Value
Maximum Transmit Power Available	0.0 dBW
Peak Antenna Gain (Transmit, 1.615 GHz)	2.0 dBi
Peak Antenna Gain (Receive, 2.490 GHz)	2.0 dBi
Maximum EIRP	2.0 dBW
Maximum EIRP Density per Carrier	–15.0 dBW/4 kHz

The maximum EIRP of 2 dBW is dictated by the maximum available transmitter power of the radio and its peak antenna gain. The maximum EIRP density is the EIRP divided by the channel bandwidth of 200 kHz and further corrected for the required 4 kHz bandwidth. The maximum

EIRP density per carrier meets the -15 dBW/4 kHz MES limit specified in the U.S. Table of Frequency Allocations.⁷

e. Description of Modulation

ANT 4 employs the following modulation and signal processing characteristics:

- The transmitter utilizes single-carrier MSK or BPSK modulation.
- Baseband filtering is implemented to meet the out-of-band emissions requirements as shown in Figures 1 and 2.
- The receiver utilizes OFDM (power spectral density shown in Figure 3) or BPSK modulation with direct sequence spread spectrum mode (waveform filter response shown in Figure 4).
- For OFDM, the receiver's filtering characteristics conform to the Adjacent Channel Selectivity, In-band Blocking, Out-of-band Blocking, and Narrowband Blocking requirements defined in 3GPP TS 36.521 for a 1.4 MHz LTE channel.

⁷ See 47 C.F.R. § 2.106 n.364.

Figure 1 – Return power spectral density – MSK

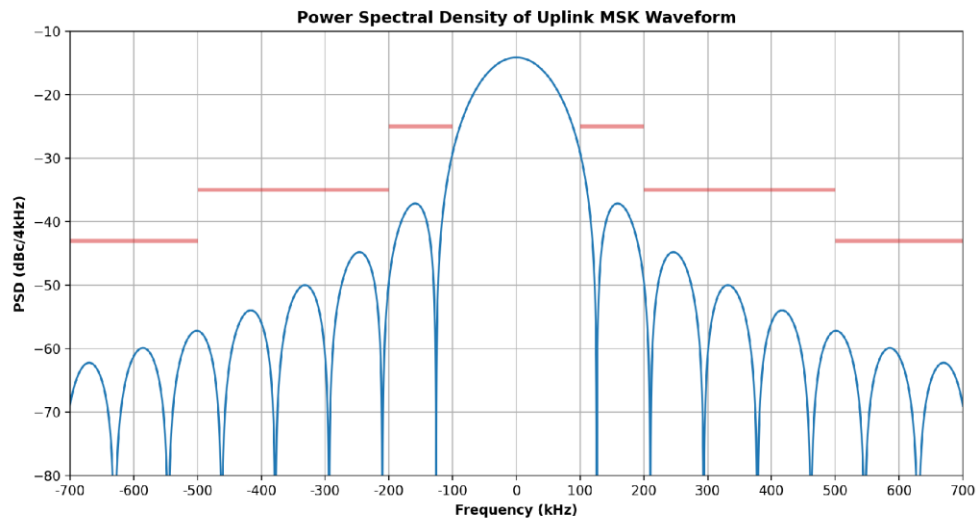


Figure 2 – Return power spectral density – BPSK

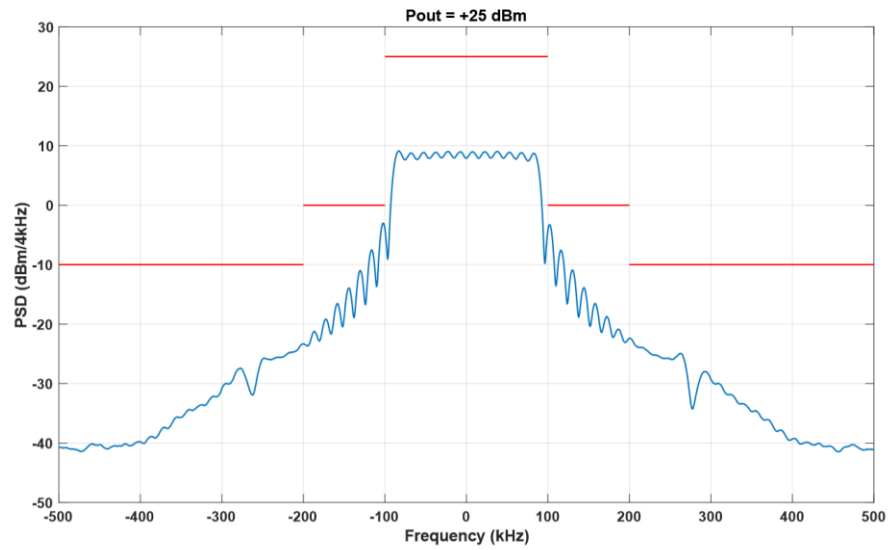


Figure 3 – Forward power spectral density – OFDM

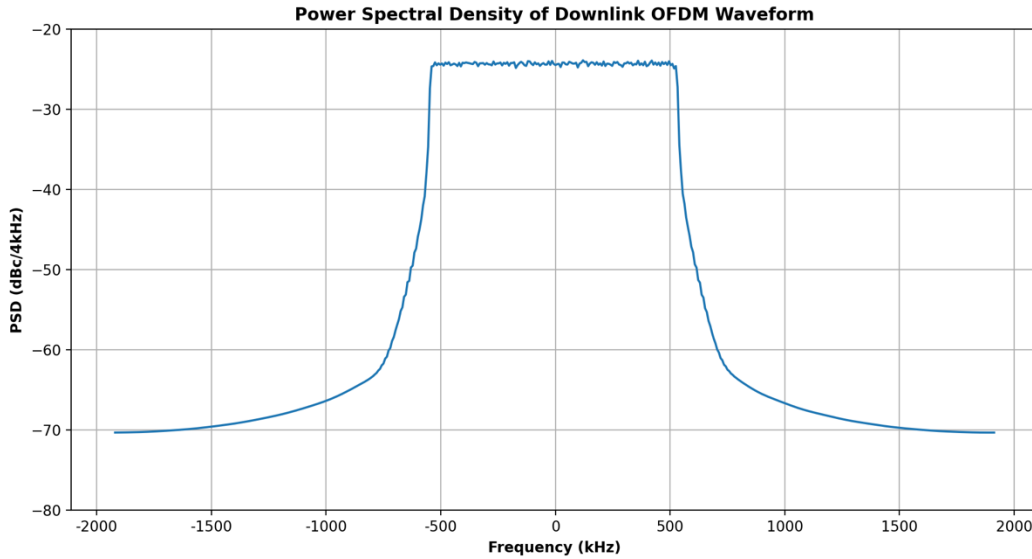
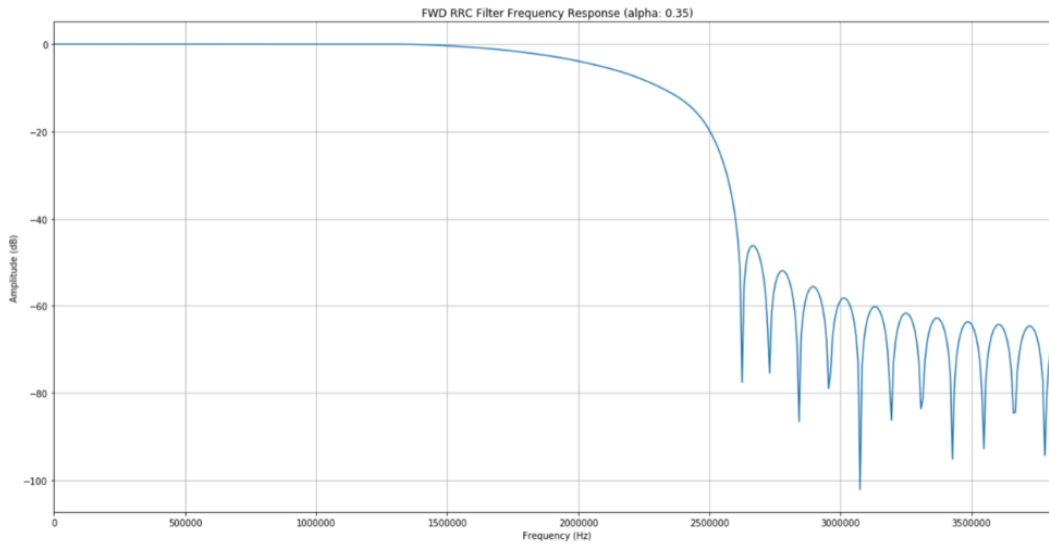


Figure 4 – Forward power spectral density – BPSK



f. Protection of Other Radio Services

Radioastronomy Protection. ANT 4 will operate in the 1610-1618.725 MHz (Earth-to-space) band, in which MSS is co-primary with Radiodetermination Satellite Services. For operation of ANT 4, Skylo expects the satellite service provider to abide by the radioastronomy coordination guidelines set forth in 47 C.F.R. § 25.213(a). ANT 4 will not use particular channels

between 1610.6-1613.8 MHz whenever they are located within the radioastronomy exclusion zones. Operation of ANT 4 devices will be prohibited in the joint band in designated radio-astronomy exclusion zones.

GNSS Protection. ANT 4 will comply with all applicable Commission out-of-band emission limits, including 47 C.F.R. §§ 25.202(f) and 25.216(c), (f), (g), and (i).

IV. CONCLUSION

Grant of this application will add critical satellite capacity for Skylo to meet rapidly increasing consumer demand for direct to device services and ubiquitous connectivity, and accordingly, is in the public interest. Skylo respectfully requests that the Commission grant this modification of its blanket license for MES.

Respectfully submitted,

/s/ MINDEL DE LA TORRE

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Dated: July 30, 2026

ATTACHMENT 1

Technical Certification

I, ANDREW NUTTALL, hereby certify, under penalty of perjury, that I am the technically qualified person responsible for the preparation of the engineering information contained in the technical portions of the foregoing application and the related attachments, that I am familiar with Part 25 of the Commission's rules, and that the technical information is complete and accurate to the best of my knowledge and belief.

/s/ ANDREW NUTTALL

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