

Exhibit A – Narrative Supplement
STA Application
Applicant: Kongsberg Satellite Services AS
Call Sign: E120025

Kongsberg Satellite Services AS (“KSAT”) provides this information pursuant to Section 25.120 of the Commission’s rules¹ to supplement its application for special temporary authority (“STA”) to change the remote control point for the transmit/receive satellite earth station in Fairbanks, Alaska (call sign E120025)² (“Station”) from the facility operated by Terra Bella Technologies Inc.³ (“Terra Bella”), formerly known as Skybox Imaging, Inc.,⁴ to KSAT’s Tromsø Network Operations Center (“TNOC”) in Tromsø, Norway.

In a separate application filed concurrently with this STA application, KSAT seeks, with Terra Bella’s assent, the Commission’s consent to assign the license for the Station from Terra Bella to KSAT (“Assignment Application”). KSAT seeks grant of this STA application contingent upon and concurrent with the grant of the Assignment Application.

1. Description of the Request

With this application, KSAT requests special temporary authority to change the remote control point for the Station from Terra Bella’s headquarters in Mountain View, CA to KSAT’s TNOC in Tromsø, Norway.

KSAT seeks this change in the Station’s remote control point because Terra Bella has contracted with KSAT for KSAT to assume ownership of and operational responsibility for the Station. The change is part of Terra Bella’s strategy to focus its efforts on its

¹ 47 C.F.R. § 25.120 (2015). *See also* The International Bureau Provides Guidance Concerning the Relocation of Earth Station Remote Control Points, DA 06-978 (FCC rel. May 4, 2006) (“[W]here a licensee considers a change in the Earth station’s remote control point, including any relocation of the remote control point to a location outside the United States, the licensee must seek prior authorization under Section 25.117 [modification of station license] of the Commission’s rules.”).

² Skybox Imaging, Inc. Application for Fairbanks Earth Station, IBFS File No. SES-LIC-20120131-00120 (FCC, granted Dec. 6, 2012).

³ Terra Bella is a direct, wholly-owned subsidiary of Google, Inc., and Google, Inc. is a direct, wholly-owned subsidiary of Alphabet, making Terra Bella an indirect, wholly-owned subsidiary of Alphabet Inc. Ownership of Skybox Imaging, Inc. was transferred to Google, Inc. in 2014, and then from Google to Alphabet Inc. in 2015. *See* Skybox Imaging, Inc. Application for Transfer of Control E120025 & E130037 (Fairbanks & Half Moon Bay), IBFS File No. SES-T/C-20140613-00519 (FCC, granted July 30, 2014); Skybox Imaging, Inc. Application for Pro Forma Transfer of Control, IBFS File No. SES-T/C-20151019-00746 (FCC, granted Nov. 19, 2015).

⁴ Letter from Ulises R. Pin to Marlene H. Dortch, Notification of Licensee Change of Name (Jan. 12, 2016), attached to Skybox Imaging, Inc. Modification Application, IBFS File No. SES-MOD-20150728-00475 (FCC, granted Nov. 4, 2015).

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remote sensing satellite business,⁵ a strategy that is further reflected in the Assignment Application filed concurrently with this application.

KSAT asks that this STA request be granted concurrently with the grant of the Assignment Application and that the STA be valid for a 60-day period that commences with notification of the consummation of the assignment. Within 5 days of the consummation, KSAT will notify the Commission of the consummation of the assignment of the Station, as per Section 25.119(f).⁶ That notification will trigger the start of the 60-day STA period. Shortly after the consummation date for the assignment of the Station license to KSAT, KSAT will file a modification application with the Commission for permanent authority to change the Station's remote control point from Mountain View, CA to Tromsø, Norway.

KSAT has appended to this Narrative Supplement an FCC Form 312 Schedule B for the Station indicating the new remote control point,⁷ contact person,⁸ and telephone number.⁹ All other Schedule B information remains as it appears on the existing license.

2. Public Interest Statement

Grant of this STA request will serve the public interest in accordance with Section 25.120(b)(1) of the Commission's rules.¹⁰ Assuming the assignment application is granted, KSAT will be the new licensee and changing the remote control point to KSAT's TNOC in Tromsø, Norway will increase the operational efficiency of the Station and avoid interruptions in the Station operation.

KSAT will operate the Station remotely from Tromsø, Norway, bringing to bear all the benefits of the TNOC, including the technical expertise and deep experience of its staff, which controls and coordinates the operations for several other ground stations operating with Terra Bella's constellation around the world.

⁵ The Station currently operates with Terra Bella's satellite constellation (call sign S2862). See Skybox Imaging Application for EESS Satellite System, IBFS File No. SAT-LOA-20120322-00058 (FCC, granted Sept. 20, 2012). Terra Bella maintains another ground station in Half Moon Bay, CA (call sign E130037), which is independently capable of providing tracking, telemetry, and control for the SkySat satellite constellation.

⁶ 47 C.F.R. § 25.119(f).

⁷ Form 312, Schedule B, Questions E61-E66 (B10 on Feb. 1998 form).

⁸ Form 312, Schedule B, Question E2 (B1e on Feb. 1998 form).

⁹ Form 312, Schedule B, Question E6 (B1c on Feb. 1998 form).

¹⁰ See 47 C.F.R. § 25.120(b)(1); 47 U.S.C. § 309(f) (2015).

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KSAT is a global leader in ground station operations for remote sensing satellites. It operates a global network of ground stations primarily for satellite data acquisition and tracking under contract to commercial and government satellite operators around the world.

Because of KSAT's expertise with the operation and maintenance of satellite earth station facilities, the change in the Station's remote control point should be completed without disruption to its operations or in the provision of service to Terra Bella's customers. KSAT will continue to operate the Station in the same manner that Terra Bella operates it today, in conjunction with the SkySat constellation and in compliance with the Commission's rules (including the rules for control of transmitting stations in Section 25.271¹¹ and inter-system coordination in Section 25.272¹²).

For the aforementioned reasons, KSAT respectfully submits that it is in the public interest to grant the requested STA.

¹¹ 47 C.F.R. § 25.271.

¹² *Id.* § 25.272.

**FEDERAL COMMUNICATIONS COMMISSION
SATELLITE EARTH STATION AUTHORIZATIONS
FCC Form 312 - Schedule B: (Technical and Operational Description)**

If VSAT Network, provide the SITE-ID (Item B1b) of the station that B8-B13 are in response to (HUB, REMOTE1, etc.): _____

B8. If the proposed antenna(s) operate in the Fixed Satellite Service (FSS) with geostationary satellites, do(es) the proposed antenna(s) comply with the antenna gain patterns specified in Section 25.209(a) and (b) as demonstrated by the manufacturer's qualification measurements? If NO, provide as an exhibit, a technical analysis showing compliance with two-degree spacing policy.	<input type="checkbox"/> YES	<input type="checkbox"/> NO												
B9. If the proposed antenna(s) do not operate in the Fixed Satellite Service (FSS), or if they operate in the Fixed Satellite Service (FSS) with non-geostationary satellites, do(es) the proposed antenna(s) comply with the antenna gain patterns specified in Section 25.209(a2) and (b) as demonstrated by the manufacturer's qualification measurements?	<input type="checkbox"/> YES	<input type="checkbox"/> NO												
B10. Is the facility operated by remote control? If YES, provide the location and telephone number of the control point.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO												
Remote Control Point Location:														
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="4" style="padding: 2px;"> B10a. Street Address Prestvannveien 38 </td> </tr> <tr> <td style="width: 33%; padding: 2px;"> B10b. City Tromsø </td> <td style="width: 33%; padding: 2px;"> B10c. County </td> <td style="width: 14%; padding: 2px;"> B10d. State / Country Norway </td> <td style="width: 14%; padding: 2px;"> B10e. Zip Code 9011 </td> </tr> <tr> <td colspan="2" style="padding: 2px;"> B10f. Telephone Number (+47) 77 60 02 50 </td> <td colspan="2" style="padding: 2px;"> B10g. Call Sign of Control Station (if appropriate) </td> </tr> </table>			B10a. Street Address Prestvannveien 38				B10b. City Tromsø	B10c. County	B10d. State / Country Norway	B10e. Zip Code 9011	B10f. Telephone Number (+47) 77 60 02 50		B10g. Call Sign of Control Station (if appropriate)	
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B10f. Telephone Number (+47) 77 60 02 50		B10g. Call Sign of Control Station (if appropriate)												
B11. Is frequency coordination required? If YES, attach a frequency coordination report as an exhibit.	<input type="checkbox"/> YES	<input type="checkbox"/> NO												
B12. Is coordination with another country required? If YES, attach the name of the country(ies) and plot of coordination contours as an exhibit.	<input type="checkbox"/> YES	<input type="checkbox"/> NO												
B13. FAA Notification - (See 47 CFR Part 17 and 47 CFR Part 25.113(c)) Where FAA notification is required, have you attached a copy of a completed FCC Form 854 and/or the FAA's study regarding the potential hazard of the structure to aviation? FAILURE TO COMPLY WITH 47 CFR PARTS 17 AND 25 WILL RESULT IN THE RETURN OF THIS APPLICATION.	<input type="checkbox"/> YES	<input type="checkbox"/> NO												