



LMI Advisors LLC
2550 M Street, NW, Suite 345
Washington, DC 20037

Carlos M. Nalda
T +1 571.332.5626
cnalda@lmiadvisors.com

June 18, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: RBC Signals LLC – Section 1.65 Submission
File No. SES-STA-20180430-00416**

Dear Ms. Dortch:

Pursuant to Section 1.65 of the Commission's rules, 47 C.F.R. § 1.65, RBC Signals LLC ("RBC Signals") updates certain information in connection with the above-referenced 30-day special temporary authorization ("STA"). The STA was granted on May 31, 2018, to operate two M2 Antenna Systems Yagi antennas at a site in Windham, New York to communicate with Analytical Space, Inc.'s Radix experimental cubesat to perform tracking, telemetry and command ("TT&C") for housekeeping, orientation, and subsystem control in the 401.24-401.36 MHz band (Earth-to-space/space-to-Earth).

On June 7, 2018, the FCC adopted a condition limiting transmission from the Windham, NY site while the International Space Station ("ISS") is in radio line-of-sight to address potential spectrum compatibility concerns. Because the Radix cubesat is being deployed from the ISS, however, this condition precludes TT&C communications with the satellite and makes the STA unusable. In addition, RBC Signals has learned that the earliest deployment date for the Radix cubesat is June 24, 2018 (only 6 days before the original grant expires), which further limits the utility of the STA.

Consultations with NASA confirm that the spectrum compatibility concerns exist only during extravehicular activity ("EVA") on the ISS. As a result, NASA has agreed to accept modifications to the original condition as shown below (with additional language underscored):

Uplink operations from the M2 Antenna Systems Yagi antenna to the Radix CubeSat shall not occur while any extravehicular activity (EVA) is taking place when the NASA International Space Station (ISS) (NORAD designation 25544 or international spacecraft ID 1998-067A) is within the horizon to horizon view of the RBC Signals facility in Windham, New York. NASA shall provide advance notification to RBC Signals of all EVA dates/time frames so that RBC Signals may inhibit uplink operations during these periods.

Given that the Radix satellite will be deployed no earlier than June 24, 2018, and the original grant was rendered unusable due to the condition discussed above, RBC Signals respectfully requests that the 30-day STA be reissued with an effective date of June 24, 2018, and with the condition modified as above. Reissuance will allow RBC Signals to perform critical TT&C functions for the Radix cubesat mission during its earliest potential operating period. RBC Signals also intends to apply for a six-month STA for these operations to ensure continuing authority beyond the adjusted 30-day STA period. No other information in support of this STA request has changed.

Please do not hesitate to contact me with any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Carlos M. Nalda". The signature is fluid and cursive, with the first name "Carlos" being the most prominent.

Carlos M. Nalda
Principal
LMI Advisors

cc: Paul Blais, FCC International Bureau
Catherine Sham, NASA