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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-INTR2018-02538

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 request for Special Temporary Authority (“STA”).

RBC Signals seeks this STA to operate two (2) existing M2 Antenna Systems Yagi antennas at a site in Windham, New York to communicate with the U.S.-licensed Astranis Demosat-2 cubesat in the 401.6-401.75 MHz band (Earth-to-space/space-to-Earth) to evaluate tracking, telemetry and command (“TT&C”) link stability and functionality prior to operations from the site with the Analytical Space Radix cubesat, which is the subject of a recently granted STA and separate Section 1.65 letter submitted today.¹ Grant of this STA request will allow RBC Signals to validate its earth station operations and ensure it can provide effective longer-term TT&C support for Radix and other low-Earth orbit (“LEO”) non-geostationary orbit satellite (“NGSO”) cubesat missions.

In order to address potential spectrum compatibility concerns raised by NASA regarding similar operations from the Windham, New York site, RBC Signals would suggest including the following condition in any grant of its pending STA request:

Uplink operations from the M2 Antenna Systems Yagi antenna to the Astranis Demosat-2 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.

NASA has confirmed that spectrum compatibility concerns in the 401-402 MHz frequency band exist only during EVA and has agreed to accept the specified condition.

¹ See Request of RBC Signals LLC for 30-Day Special Temporary Authorization To Operate an Earth Station To Provide Tracking, Telemetry & Command Services (File No. SES-STA-20180430-00416).

Grant of the requested authority, with the added condition, will allow RBC Signals to operate the 400 MHz Yagi with the Demosat-2 cubesat to validate the link stability and operability of the 400 MHz Yagi, helping to ensure it is able to provide effective and safe TT&C support to other cubesat missions as needed. 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,



Carlos M. Nalda
Principal
LMI Advisors

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