

Approved by OMB
3060-0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
GUAM STA for Global 3 and 4

1. Applicant

Name:	ATLAS Space Operations, Inc	Phone Number:	231-598-6184
DBA Name:		Fax Number:	
Street:	10850 E Traverse Hwy Ste 3355	E-Mail:	mcarey@atlasground.com
City:	Traverse City	State:	MI
Country:	USA	Zipcode:	49684 -
Attention:	Mr Michael J Carey		



GRANTED
National Bureau

File # SES-STA-20190208-00083
Call Sign E190037 Grant Date 3-18-19
(or other identifier)
Term Dates
From: 4-1-18 To: 5-30-19
Approved: Paul E. [Signature]

Applicant: ATLAS Space Operations, Inc.
Call Sign: E190037
File No.: SES-STA-20190208-00083
Special Temporary Authority ("STA")



File # SES-STA-20190208-00083
Call Sign E190037 Grant Date 3-18-19
(or other identifier)
Term Dates
From: 4-1-19 To: 5-30-19
Approved: [Signature]

ATLAS Space Operations, Inc. ("ATLAS Space Operations") is granted STA, beginning April 1, 2019 until May 30, 2019 to provide telemetry, tracking and control ("TT&C") functions for the BlackSky Global 1-4 satellites constellation (Call Sign S3032) from geographic coordinates 13° 30' 48.8"N/144° 49' 31.1"E (NAD-83) in Dededo, GUAM in frequency bands: 450.185-450-215 MHz, 2071.775-2071.975 MHz (left and right circular polarization) (Earth-to-space) and 401.485-401.515 MHz, 8025-8225 MHz (left and right circular polarization) (space-to-Earth). The launch is expected to be on April 1, 2019. STA operations will be under the following conditions:

1. ATLAS Space Operations must provide Stop Buzzer POC information to Mr. Darren Townsend, Darren.townsend@navy.mil.
2. ATLAS must maintain a 24/7 contact at all time for this Guam earth station at +1 832 855 0844. Mikel Acasuso phone +1 231 598 6184, macasuso@atlasground.com and Hanna Pritchard +1 231 598 6184, hpritchard@atlasground.com must also respond to operational questions and must stop operation if interference is reported to them.
3. Operations are limited to the following emissions and power levels:

Frequency band (MHz)	Emission designator	Max eirp (dBW)	Max eirp density (dBW/4k Hz)
450.185-450-215 (secondary TT&C on uplink)	30K0F1D	29.0	20.30
401.485-401.515 (secondary TT&C on downlink)	30K0F1D	n/a	n/a
2071.775-2071.975 (primary TT&C)	200KF1D	52.0	35.0
8025-8225 (Remote Sensing data)	200MG1D	n/a	n/a

4. All operations shall be on an unprotected, non-interference basis to both government and non-government operations. In the event of any harmful interference as a result of operations under this grant of STA, ATLAS Space Operations shall cease operations

immediately upon notification of such interference and shall immediately inform the Commission, in writing, of such an event.

5. The licensee shall take all necessary measures to ensure that antennas in operation do not create potential exposure of humans to radiofrequency radiation in excess of the FCC exposure limits defined in 47 CFR 1.1307(b) and 1.1310 wherever such exposures might occur. Measures must be taken to ensure compliance with limits for both occupational/controlled exposure and for general population/ uncontrolled exposure, as defined in these rule sections. Compliance can be accomplished in most cases by appropriate restrictions such as fencing. Requirements for restrictions can be determined by predictions based on calculations, modeling or by field measurements. The FCC's OET Bulletin 65 (available on-line at www.fcc.gov/oet/rfsafety) provides information on predicting exposure levels and on methods for ensuring compliance, including the use of warning and alert signs and protective equipment for workers. .

6. This authorization is subject to the conditions set forth in the Commission's Order (DA 99-353) released February 17, 1999. Any use of the 402-403 MHz band by the Licensee for TT&C must be on a non-interference basis to all other systems operating under a primary or secondary status in the band. As a non-conforming user, Licensee will also be required to accept any interference to it that is caused by any of these allocated services.

7. This authorization is subject to the following conditions: 1) Operations under the authority of this assignment (8190 MHz) are on a non-interference basis to existing DSCS earth station and existing government terrestrial stations on the same adjacent channel and no protection can be afforded by the government. 2) This non-government space station assignment is made with the understanding that protection cannot be guaranteed to reception of the non-government earth stations located at Barrow, AK and Dulles, VA due to existing transmitting earth stations and/or government fixed stations.

8. Operations under the authority of this assignment (8190 MHz) are on a non-interference basis to existing DSCS earth station and existing government terrestrial stations on the same adjacent channel and no protection can be afforded by the government.

9. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at ATLAS Space Operations' own risk.

10. Grant of this STA is without prejudice to any determination that the Commission may make regarding pending FCC IBFS File Number: SES-LIC-20181224-03650 or future ATLAS Space Operations' applications.

This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. §0.261, and is effective upon release.

2. Contact

Name:	Hanna Pritchard	Phone Number:	231-598-6184
Company:	ATLAS Space Operations, Inc	Fax Number:	
Street:	10850 E Traverse Hwy Ste 3355	E-Mail:	hpritchard@atlasground.com
City:	Traverse City	State:	MI
Country:	USA	Zipcode:	49684 -
Attention:		Relationship:	Other

(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)

3. Reference File Number SESLIC2018122403650 or Submission ID

4a. Is a fee submitted with this application?

- ☒ If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- ☐ Governmental Entity ☐ Noncommercial educational licensee
- ☐ Other (please explain):

4b. Fee Classification CGX – Fixed Satellite Transmit/Receive Earth Station

5. Type Request

- ☒ Use Prior to Grant ☐ Change Station Location ☐ Other

6. Requested Use Prior Date
04/01/2019

7. City Dededo

8. Latitude
(dd mm ss.s h) 13 30 48.8 N

9. State GU	10. Longitude (dd mm ss.s h) 144 49 31.1 E
11. Please supply any need attachments. Attachment 1: Public Interest Attachment 2: Attachment 3:	
12. Description. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.) STA to permit critical operation coinciding with the launch of Global 3 and Global 4, part of Global constellation (call sign	
13. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes. ☒ Yes ☐ No	
14. Name of Person Signing Hanna Pritchard	15. Title of Person Signing Orbital Analyst
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).	

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ATLAS Space Operation, Inc.
10850 E. Traverse Highway, Suite 3355
Traverse City, Michigan 49684-1363

Attachment 1

Public Interest Statement

Pursuant to Section 25.120 of the Commission's Rules, ATLAS Space Operations, Inc ("ATLAS") requests Special Temporary Authority ("STA") for a period of sixty (60) days, commencing on April 1, 2019, for the operation of a satellite earth station in Guam to communicate with the Global 1-4 satellites in accordance with parameters set forth in our pending application for regular license authority to operate this station (See *FCC call sign E190037* and *Application for Earth Station Authority, File No. SES-LIC-20181224-03650*). That Application remains pending and has not yet gone on Public Notice.

On October 23, 2018, the Commission granted BlackSky a (corrected) space station license for its 4-satellite Global constellation. See *FCC call sign S3032, File No. SAT-LOA-20180320-00023*. Global-1 launched in November 2018 and Global-2 launched in December, 2018. Global-3 and Global-4 are scheduled for launch in April 2019. The ATLAS satellite earth station in Guam is required to provide TT&C and downlink support to the Global 1-4 constellation, particularly Global-3 and Global-4.

As shown in the pending Application, operation of the earth station has been coordinated with the local license holders and a frequency coordination and interference analysis report has been produced for the S-band transmissions while the UHF-band efforts are being completed now. We understand that BlackSky is pending completion of coordination efforts with NASA for space-to-Earth transmissions in the 8025-8400 MHz frequency band towards the Guam earth station and therefore will not transmit in this band until this coordination effort is complete.

Operation of the Guam earth station from April 1, 2019 is important in reducing the risks of early operations of Global-3 and Global-4, scheduled for launch later in April. The proposed operations will enable frequent, predictable contact with each spacecraft to support potential collision avoidance and perform orbit maintenance. We understand that operation of the Guam earth station is important to protect and maintain Global-3 and Global-4 in safe and stable orbits and that granting the STA would well serve the public interest.

24 hour contact information for the Guam earth station is as follows: +1 832 855 0844

Mikel Acasuso, +1 231 598 6184, macasuso@atlasground.com

Hanna Pritchard, +1 231 598 6184, hpritchard@atlasground.com

BLACK(SKY

February 11, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street South West
Washington, D.C. 20554

**RE: BlackSky Global LLC – Call Sign S3032
Letter in Support of ATLAS Space Operation, Inc. SES-STA-20190208-00083**

Dear Ms. Dortch,

BlackSky Global LLC (“BlackSky”) submits this letter in support of ATLAS Space Operations, Inc (“Atlas”) Special Temporary Authority (“STA”) Filing Number SES-STA-20190208-00083 for the operation of its Guam earth station to communicate with BlackSky’s Global satellites. Atlas filed its initial application for authority to operate the station on December 24, 2018 (See Application for Earth Station Authority, FCC call sign E190037, File No. SES-LIC-20181224-0365). That application remains pending and has not yet gone on Public Notice.

As background, BlackSky obtained a grant from the Commission for authority to construct, deploy and operate a constellation of up to four (4) technically identical Non-Geostationary Satellite space stations called Global 1-4, pursuant to its application IBFS File No. SAT-LOA-20180320-00023, Call Sign S3032, in accordance with the terms and conditions set forth in the authorization, which was originally granted by the FCC on October 3, 2018, and corrected on October 23, 2018.

It is important to BlackSky that the Guam earth station be permitted to come on line before the launches of Global-3 and Global-4, each currently scheduled for April 2019. While BlackSky has other earth stations to communicate with its satellites, due to the inclined orbits planned for Global-3 and Global-4, there would be a daily gap between passes at the earth stations that are capable of communicating with these satellites of 16-18 hours. If BlackSky is able to utilize the Guam earth station referenced herein, the gap between passes will be reduced to 5-9 hours. Use of the Guam earth station will significantly reduce the risks during early operations and enable more frequent and predictable contact with each spacecraft to address potential collision avoidance and perform orbit maintenance. For this reason, BlackSky views the operation of the Guam earth station as important to protect and maintain Global-3 and Global-4 in safe and stable orbits and urges that granting the STA serves the public interest.

While ordinarily there might still be time for the Guam earth station to be regularly licensed without need for an STA, given delays that have already occurred due to the previous government shutdown, the resulting backlog, and concern that there may occur yet another shutdown in the near future, BlackSky believes that it is prudent for Atlas to seek such temporary authority and BlackSky supports that effort.

BlackSky is mindful of the condition to its space station authorization (Condition 7) that restricts its transmission of remote sensing data in the 8025-8400 MHz frequency band to those stations that

BlackSky Global LLC
1505 Westlake Avenue North, Suite 600
Seattle, Washington 98109, U.S.A.



have been coordinated with the National Aeronautics and Space Administration (NASA). Currently, coordination with NASA has been completed for only the planned initial earth stations noted above. Efforts to coordinate transmissions to the Guam station have been delayed due to the federal government shutdown and the furlough of the team at NASA responsible for such coordination. While BlackSky continues to work to coordinate, even with an STA grant for the operation of the Guam station, BlackSky will not transmit to it in the 8025-8400 MHz frequency band until NASA is able to confirm coordination. Nevertheless, for the reasons stated above, BlackSky urges grant of the STA request in order to allow communication with its spacecraft on the other requested frequencies.

Please contact Kristina Hloptsidis (kristinah@spaceflightindustries.com) if you have any questions.

Best Regards,

DocuSigned by:

A handwritten signature in black ink that reads "Kristina Hloptsidis".

4A521E3580E04DF...

Kristina Hloptsidis

Director of Regulatory and Compliance