NARRATIVE

BlackSky Global, LLC ("BlackSky"), pursuant to Section 25.120 of the Commission's rules,[1] hereby requests Special Temporary Authority ("STA") to operate two earth stations - each located at the facilities of SRI International ("SRI") in Palo Alto, California – [redacted] with BlackSky's non-geostationary orbit ("NGSO") Earth Exploration Satellite Service satellite, Global-3. BlackSky seeks an STA for the 30-day period beginning on November 15, 2019. The technical specifications for these operations are set forth in Attachment 2 hereto, which provide the information that would be appear in Schedule B of FCC Form 312, if regular authority were being sought. Expedited action on this matter is requested to allow BlackSky to respond to the emergency conditions described below.

I. Underlying Circumstances and Proposed Operations

BlackSky's Global-3 is currently a degraded satellite. [redacted]

Timing is critical. The cyclical nature of Global-3's orbit results in limited opportunities and short periods of access during daylight hours when solar power will be strongest. [redacted]

[1] 47 CFR § 25.120.

[redacted] BlackSky seeks STA authority to use two of SRI's earth station antennas. These antennas have different features each of which BlackSky would like to employ [redacted] The 60-foot antenna located at the earth station is more agile and better able to track a low earth orbit spacecraft while the 150-foot antenna located at the earth station has the higher gain of the two. BlackSky's proposed operation would be on transmit and receive UHF frequencies (401.5 MHz or 401.375 MHz (space-to-Earth) and 449.75-450.25 MHz (Earth-to-space) (center carrier frequency at 450.2 MHz) for which Global-3 is licensed.

BlackSky will control all transmissions from the earth stations to Global-3 while SRI will be responsible for the operation and direction of the antenna.

II. SRI's Earth Station Facilities Have Been Previously Approved by the Commission on an Experimental Basis for Operation on the Same Frequencies Requested for Use.

The SRI 150-foot antenna is already licensed by the Commission for use by Blue Canyon Technologies ("Blue Canyon")[2] under an experimental license for the same UHF transmit frequency band that would be employed by BlackSky. BlackSky understands that the 150 foot antenna is also used from time to time for federal government operations..

The SRI 60 foot antenna is currently licensed by the Commission to SRI under an experimental license for the use of different frequencies than would be employed by BlackSky. Although the UHF frequencies on the 60 foot antenna are not the subject of a current Commission license, the use of that antenna on the frequencies sought to be employed by BlackSky was previously authorized under experimental licenses granted

[2] *See* Blue Canyon Technologies, FCC Callsign WJ2XAU, File No. 0238-EM-CM-2018, issued Feb 11, 2019.

to Planet Labs[3] and more recently for use by BlackSky under an experimental license for its earlier Pathfinder program.[4]

Under these circumstances, FAA notification is not required because the earth stations to be employed are already built and operating under other FCC licenses and no new construction is proposed. The frequencies to be used by BlackSky for transmission have also already been licensed by the Commission from these locations and are also used from time to for U.S. government operations. In addition, from information supplied to BlackSky by SRI: the 150-foot antenna, known locally as the "Big Dish" was built more than 50 years ago, has long been used by pilots as a visual landmark, and is fitted with red beacon lights; the 60-foot antenna is about 40 years old and is also effectively shielded by the 150 foot antenna in the same SRI earth station complex.

BlackSky will coordinate its operations on both of the 150 foot and 60 foot antenna through SRI to ensure to ensure there that there is no conflict in usage, including allowing full priority for any required federal operation of the facilities. In all events, as to the use of each antenna, BlackSky will operate on a non-interference basis.

III. Conclusion

Accordingly, for good cause as shown herein, BlackSky requests that the Commission grant BlackSky's STA request.

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[3] *See* Planet Labs Inc, FCC Callsigns WF9XKA, WG2XFY, WG2XKW, WG2XKX.
[4] *See* BlackSky Global, LLC, FCC Callsign WH2XPS, 0339-EX-RR-2016.