

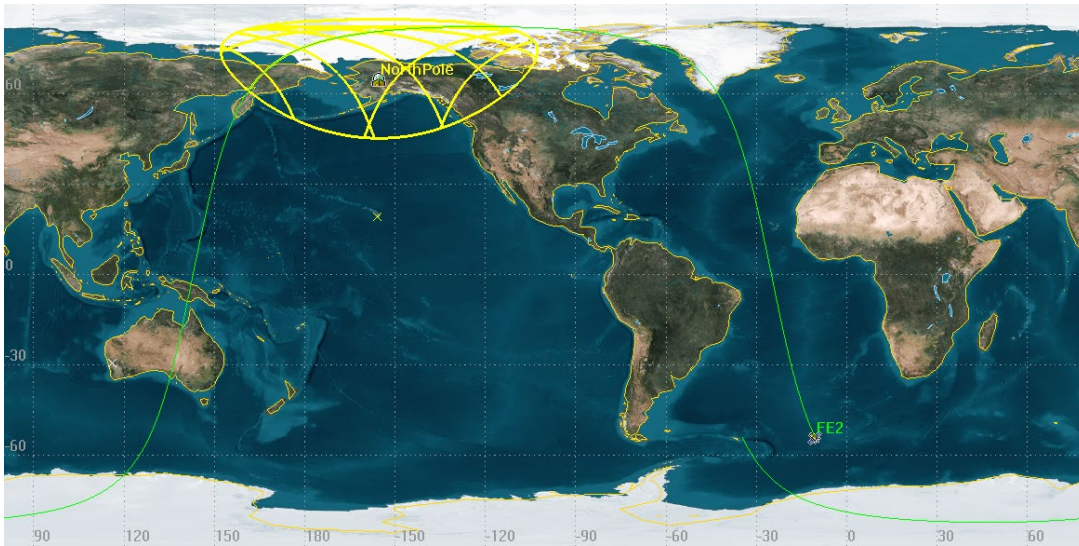
USN LEOP support for Falconeye-2 from Alaska

Falconeye-2 is the second generation earth observation satellites launched by UAE to serve the European Union. Falconeye-2 will be launched from the Kourou space center on Nov 29th, 2020 at a nominal liftoff time of 01:33:28 UTC. The Falconeye-2 spacecraft will be supported by the USN Alaska ground station using a downlink frequency = 2264.500 MHz and uplink = 2085.200 MHz, and has been fully coordinated by Comsearch.

The LEOP support is scheduled to be conducted starting 10 days after spacecraft separation when the orbit is stabilized to pass over Alaska. All visible passes will not be supported, but for planning purposes it should be assumed that all the passes visible from Alaska could be supported for the 7 days of the LEOP as shown below. Also note USN is requesting the STA be valid for 30 days after launch as the Alaska ground station will be asked to be backup for final on-orbit testing. The first day of support is Dec 9th, 2020 and those passes are shown below. The support after 7 days is expected to be one pass each week.

Falconeye-2

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1 98765U 18123A 20334.25000000 .00000000 00000-0 +12043-8 2 13  
2 98765 97.8625 46.0046 0000609 310.9014 311.8760 14.90311960 18
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USN Alaska coverage of Falconeye-2 (typical coverage each day) LEOP Dec 2020

USN Alaska possible passes for Falconeye-2 9 Dec 2020 UTC

Pass	Start Time (UTCG)	Stop Time (UTCG)
1	9 Dec 2020 00:29:16	9 Dec 2020 00:37:04
2	9 Dec 2020 02:04:41	9 Dec 2020 02:10:00
3	9 Dec 2020 03:38:35	9 Dec 2020 03:44:02
4	9 Dec 2020 05:11:31	9 Dec 2020 05:19:30
5	9 Dec 2020 06:45:20	9 Dec 2020 06:55:22
6	9 Dec 2020 08:20:57	9 Dec 2020 08:31:09
7	9 Dec 2020 09:59:12	9 Dec 2020 10:06:18
8	9 Dec 2020 19:52:24	9 Dec 2020 20:00:25
9	9 Dec 2020 21:27:45	9 Dec 2020 21:38:06
10	9 Dec 2020 23:03:34	9 Dec 2020 23:13:21

Flux Density impinging on the ground in Alaska from Falconeye-2

The Flux density is calculated as:

$$\text{Flux density} = \text{EIRP} \div (4 \pi Rse^2)$$

Where **Rse** is the distance from spacecraft to the ground.

Where **EIRP** is the Effective Isotropic Radiated Power of the Spacecraft.

Data from the spacecraft vendor indicates that the maximum EIRP of Falconeye-2 is -1.10 dBW. The altitude (and thus the closest distance to earth during an overhead pass) is = 590 Km.

Converting -1.10 dBW to scalar watts = 0.776 watts transmitted at 2264.500 MHz

Therefore:

$$\text{Flux density} = 0.776 \div (4 \pi * 590,000 \text{ meters}^2)$$

$$\text{Flux density} = 1.773 \times 10^{-13} \text{ Watts/meter}^2$$

Or

$$\text{Flux density} = 1.773 \times 10^{-14} \text{ mW/cm}^2$$

Exhibit C
PETITION FOR WAIVER OF SECTION 25.137 AND 25.114 AND OF
THE U.S. TABLE OF FREQUENCY ALLOCATIONS

I. TO THE EXTENT THEY APPLY, GOOD CAUSE EXISTS FOR A WAIVER OF CERTAIN PORTIONS OF SECTIONS 25.137 AND 25.114

Universal Space Network, Inc. (USN) is provided limited legal and technical information for the Falconeye-2 Satellite.¹ Pursuant to Section 25.137 of the Federal Communications Commission's ("Commission" or "FCC") rules, the same technical information required by Section 25.114 for U.S.-licensed space station, and certain legal information, must be submitted by earth station applicants "requesting authority to operate with a non-U.S. licensed space station to serve the United States..."² USN seeks authority to support the Launch and Early Orbit (LEOP) and backup support of Falconeye-2, not commercial service to the United States, and thus believes that Section 25.137 does not apply.

To the extent the Commission determines, however, that USN's request for authority to provide LEOP on a special temporary basis is a request to serve the United States with a non-U.S.-licensed satellite, USN respectfully requests a waiver of Sections 25.137 and 25.114 of the Commission's rules, to the extent that USN has not herein provided the information required by these rules.³ The Commission may grant a waiver for good cause shown.⁴ A waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In this case, good cause for a waiver of portions of Section 25.114 exists. USN seeks authority only to conduct LEOP/orbital commissioning support for Falconeye-2. Thus, any information sought by Section 25.114 that is not relevant to the LEOP – e.g., antenna patterns, energy and propulsion and orbital debris - USN does not have. In addition, USN would not easily be able to obtain such information because USN is not the operator of the Falconeye-2 satellite, nor is USN in contractual privity with that operator. Rather, USN has contracted with Swedish Space Corporation, Solona Sweden (SSC) to support the LEOP portion in S-Band of the Falconeye-2 satellite.

As evidenced by the Comsearch report attached to this request, USN has coordinated the LEOP of the Falconeye-2 satellite with potentially affected terrestrial operators. Moreover, as with any STA, USN will conduct the test on an unprotected, non-interference basis to government operations.

¹ FCC Form 312 Section B

² 47 C.F.R. § 25.137(a)

³ 47 C.F.R. §§25.137 and 25.114

⁴ 47 C.F.R. §1.3

Because it is not relevant to the service for which USN seeks authorization, and because obtaining the information would be a hardship, USN seeks a waiver of all the technical and legal information required by Section 25.114, to the extent it is not provided herein. As noted above, USN has provided the required information to the extent that it is relevant to the LEOP service for which USN seeks authorization.

Good cause also exists to waive portions of Section 25.137, to the extent the information required is not herein provided. Section 25.137 is designed to ensure that “U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services” in other countries. Here, there is no service being provided by the satellite; USN is providing TT&C while the satellite is on the way to its low earth orbit. Thus, the purpose of the information required by Section 25.137 is not implicated here. For example, Section 25.137(d) requires earth station applicants requesting authority to operate with a non-U.S.-licensed space station that is not in orbit and operating to post a bond.⁵ The underlying purpose in having to post a bond – i.e., to prevent warehousing of orbital locations by operators seeking to serve the United States – would not be served by requiring USN to post a bond in order to conduct the 30 days of LEOP and orbital commissioning support (7 days of LEOP, followed by 23 days of backup) of the Falconeye-2 satellite.

It is USN’s understanding that Falconeye-2 is licensed by UAE Space Agency. Falconeye-2 is the second of the series spacecraft meant to serve the UAE. Thus, the purpose of Section 25.137 – to ensure that U.S. satellite operators enjoy “effective competitive opportunities” to serve foreign markets and to prevent warehousing of orbital locations service the United States – will not be undermined by grant of this waiver request.

Finally, USN notes that it expects to communicate with the Falconeye-2 satellite using its U.S. earth station for a period of 30 days. Requiring USN to obtain technical and legal information from an unrelated party, where there is no risk of interference and would pose undue hardship without serving underlying policy objectives. Given these particular facts, the waiver sought herein is appropriate.

⁵ 47 C.F.R. §25.137(d)(4)

II. GOOD CAUSE EXISTS FOR A WAIVER OF THE UNITED STATES TABLE OF FREQUENCY ALLOCATIONS

USN further requests a waiver of the United States Table of Frequency Allocations ("U.S. Table") as described in section 2.106 of the rules for the frequency bands 2025 – 2110 MHz (Earth-to-Space) and 2200 – 2290 MHz (Space-to-Earth).⁶ Section footnotes allow for non-federal Government use of these bands in the United States on a case-by-case non-interference basis. Such use by USN necessitates a waiver of the U.S. Table.

Good cause exists to grant USN a limited waiver of the U.S. Table to allow LEOP support of the Falconeye-2 satellite. In considering request for case-by-case spectrum uses, the Commission has indicated that it would generally grant such waivers "where there is little potential for interference into any service authorized under the Table of Frequency Allocations and when the case-by-case operator accepts any interference from authorized services."⁷ USN will coordinate with other parties operating communication systems in compliance with the Table of Frequency Allocations to ensure that no harmful interference is caused. USN seeks to operate only pursuant to special temporary authorization and thus agrees to accept any interference from authorized services. In summary, USN's operation on a non-interference, non-protected basis support waiver of the U.S. Table.

⁶ 47 C.F.R. §2.106

⁷ Previously approved STA's for Universal Space Network SES-STA-20020725-01174; SES-STA-20021112-02008; SES-STA-20040315-00475