

[Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Application of RBC Signals LLC for a	)	
30-Day Special Temporary Authorization	)	Call Sign:
to Operate with a Non-Geostationary Orbit	)	
Spacecraft	)	File No.: SES-STA-_____
	)	

REQUEST FOR SPECIAL TEMPORARY AUTHORIZATION
(RBC Signals | Windham, NY)

RBC Signals LLC (“RBC Signals”), pursuant to Section 25.120 of the Commission’s rules, 47 C.F.R. § 25.120, respectfully seeks a 30-day special temporary authorization (“STA”) to operate a fixed 400 MHz Yagi earth station in Windham, NY to conduct telemetry, tracking and command (“TT&C”) operations in the 400.48-400.52 MHz band (space-to-Earth; center frequency 400.5 MHz) and 402.88-402.92 MHz band (Earth-to-space; center frequency 402.9 MHz) to support a non-geostationary orbit (“NGSO”) deployment vehicle, the Sherpa-AC1 spacecraft, operated by Spaceflight, Inc. (“Spaceflight”).¹ As demonstrated in this application, grant of the requested authority will serve the public interest because it will allow RBC Signals to support Sherpa-AC1 operations and further facilitate U.S. leadership in the advancement of novel satellite technologies.

RBC Signals seeks this 30-day STA due to the acceleration of the launch date of the NGSO deployment vehicle. Sherpa-AC1 is now scheduled to be deployed from a Space Exploration

¹ See Spaceflight, Inc., File No. SAT-LOA-20220111-00007 (“*Sherpa-AC1 Application*”). The Sherpa-AC1 is subject to a pending application for space station authority. To the extent applicable, RBC Signals incorporates by reference relevant satellite technical and operational information provided in the *Sherpa-AC1 Application*.

Technologies Corporation (“SpaceX”) Falcon 9 on May 25, 2022.² RBC Signals respectfully requests that the Commission consider and authorize the proposed operations (as appropriately conditioned) as soon as practicable.

I. BACKGROUND

RBC Signals is a Seattle, Washington-based company that provides earth station services around the world. With this application, RBC Signals seeks temporary earth station license authority to operate in Windham, NY to support the Sherpa-AC1 mission

Sherpa-AC1 will be placed in sun synchronous orbit (“SSO”) at an altitude between 525-575 km $\pm$ 25 km at an inclination of 97.59 degrees. Sherpa-AC1 will perform a series of payload deployments and subsequently conduct orbit-raising maneuvers to a series of targeted maximum altitudes as described in the *Sherpa-AC1 Application*. With the support of RBC Signals, the Sherpa-AC1 will inject payload satellites into their desired orbits after the Sherpa-AC1 itself is deployed into orbit by the launch vehicle. Sherpa-AC1 is designed to transport and deploy seven (7) spacecraft into SSO. During the mission, RBC Signals’ TT&C operations will be conducted on an unprotected and non-interference basis intermittently when the spacecraft passes over the earth station (approximately seven times per day).

RBC will conduct all operations in accordance with the Commission’s rules and requirements governing fixed earth station operations in the subject bands. RBC Signals provides

² The mission life for the Sherpa-AC1 is approximately 1 year. RBC Signals is also seeking a long-term license which will ultimately forgo the need for RBC signals to request additional, supplemental STAs and will remove the Sherpa-AC1 from its license once the mission is complete. The original launch date of the Sherpa-AC1 was projected to be mid-June 2022.

the attached Technical Appendix, which includes a radiation hazard analysis, and as-filed Form 312 Schedule B, for information relating to the proposed earth station operations.³

II. DISCUSSION

RBC Signals seeks to provide TT&C support to the Sherpa-AC1 spacecraft from Windham, NY in the 400.48-400.52 MHz band (space-to-Earth; center frequency 400.5 MHz) and 402.88-402.92 MHz band (Earth-to-space; center frequency 402.9 MHz). RBC Signals will coordinate to ensure that these operations will not cause harmful interference to current or future co-frequency operations and that the interests of the United States are accommodated.⁴

A. Sherpa-AC1 Satellite Overview

Sherpa-AC1 will be similar to Sherpa-LTE1, which was previously approved by the Commission,⁵ and RBC Signals incorporates by reference the Sherpa-AC1 mission information and payload specifications provided in the *Sherpa-AC1 Application*. Spaceflight will host two payloads that are permanently affixed to the Sherpa-AC1 spacecraft. (NearSpace Launch's TROOP-3 payload and Xona Space System's navigational payload). In addition, there are seven customer spacecraft being carried by Sherpa-AC1. TT&C support for these important space operations is plainly in the public interest.

B. Frequency Use

a. TT&C Downlink – 400.15-401 MHz (space-to-Earth)

The United States Table of Frequency Allocations ("Table of Allocations"), Section 2.106 of the Commission's rules, 47 C.F.R. § 2.106, provides that the 400.15-401 MHz band is shared

³ RBC Signals requests leave to update the technical or operational data associated with this STA request should the Commission seek any clarifying or supplemental information in considering this request.

⁴ Spaceflight will have a camera onboard for the purpose of mission assurance and to confirm customer deployments. Spaceflight will file for and secure appropriate NOAA licensing.

⁵ See Spaceflight Inc., File No. SES-STA-20200728-00089.

between meteorological aids (Earth-to-space), mobile satellite (space-to-Earth), space research (space-to-Earth) and space operation services (space-to-Earth). RBC Signals seeks to perform TT&C downlink operations consistent with the co-primary space operations allocation in this band.⁶

RBC Signals seeks to perform TT&C downlink operations using the 400 MHz Yagi in the 400.48-400.52 MHz band (space-to-Earth; center frequency 400.5 MHz) consistent with the secondary allocation for space operations in this band. RBC Signals is not currently aware of any use of the subject frequency bands by incumbent operators near the Windham, NY facility and will coordinate as needed to ensure its TT&C operations do not cause interference with primary mobile satellite or meteorological-aid services.

b. TT&C Uplink - 402.88-402.92 MHz band (Earth-to-space)

The Table of Allocations provides that the 402-403 MHz band is allocated on a primary basis to non-Federal meteorological-aid services and on secondary basis to EESS (Earth-to-space). Moreover, the Table of Allocations provides that “in the band 401-403 MHz, the non-Federal Earth exploration-satellite (Earth-to-space) and meteorological-satellite (Earth-to-space) services are limited to earth stations transmitting to federal space stations.”⁷ RBC Signals acknowledges that there are certain U.S. government meteorological aids and Earth exploration operations conducted in the 402-403 MHz band.⁸

⁶ See 47 C.F.R. § 2.106 (defining “space operations” as “radiocommunication service concerned exclusively with the operation of spacecraft, in particularly space tracking, space telemetry, and space telecommand.”).

⁷ 47 C.F.R. §2.106, fn. US384

⁸ See https://www.ntia.doc.gov/files/ntia/publications/compendium/0402.00-0403.00_01MAR14.pdf

C. Waiver Request

The Commission may waive its rules for “good cause shown.”⁹ RBC Signals respectfully seeks a waiver of Section 2.106 of the Commission’s rules, 47 C.F.R. § 2.106, to the extent necessary to operate the 400 MHz Yagi and perform TT&C in the 402.88-402.92 MHz band using a 402.9 MHz center frequency. Good cause exists to grant a waiver in this case to permit RBC Signals to perform critical TT&C functions for the Sherpa-AC1 mission, and a waiver would not undermine the purpose of the rules. The waiver is also consistent with the Commission precedent previously granting such a waiver to operate in this band in a previous satellite authorization.¹⁰ RBC Signals acknowledges that the authority to conduct earth station operations in this band is associated with a similar grant of the *Sherpa-AC1 Application*.

The Table of Allocations, provides that the 402-403 band is allocated on a primary basis to non-federal meteorological-aid services and on secondary basis to EESS (Earth-to-space). Moreover, “in the band 401-403 MHz, the non-Federal Earth exploration-satellite (Earth-to-space) and meteorological-satellite (Earth-to-space) services are limited to earth stations transmitting to Federal space stations.”¹¹ Thus, RBC Signals seeks a waiver of this footnote to permit it to provide TT&C uplink support for the Sherpa-AC1 mission, which will facilitate the development and evaluation of an innovative U.S.-licensed satellite.

Acknowledging the connect between the *Sherpa-AC1 Application* and this earth station application, a waiver is warranted here because it will provide RBC Signals with the ability to dependably provide critical satellite support for the short-term, one-year, Sherpa-AC1 mission.

⁹ See 47 C.F.R. §1.3 (“Any provision of the rules may be waived by the Commission on its own motion or petition if good cause therefor is shown.”).

¹⁰ See Astro Digital U.S., Inc., File No. SAT-LOA-20170508-00071 (grant stamp Oct. 9, 2020) (the “*Astro Digital License*”), Condition 9.

¹¹ *Supra* n. 7.

Further, a waiver will serve the public interest as RBC Signals will support novel space technologies that bridge traditional launch deployment services. Finally, given the limited nature of the proposed operations and the coordination performed in support of the *Sherpa-AC1 Application* to ensure the proposed operations will not cause harmful interference to co-frequency operations, grant of the waiver will not undermine the purposes of the rule. Thus, there is good cause to grant the requested waiver to permit the limited earth station operations proposed herein.

D. Public Interest Considerations

Grant of this STA will further the public interest by enabling TT&C support for the Sherpa-AC1 mission to support launch and near-term operations during the pendency of RBC Signals' concurrently filed earth station license application. It will also further position the United States as a leader in the development and encouragement of pioneering satellite technologies.

RBC Signals is at the forefront of reinventing TT&C and earth station support solutions and grant of a license would further cement the United States' dedication to the advancement of satellite services in the United States. Grant of this application will enable the continued operation and realization of the significant benefits and commercial viability of novel small satellite communications systems.

III. CONCLUSION

Based on the foregoing, RBC Signals respectfully requests that the Commission grant its STA application to provide TT&C services for the Sherpa AC-1 spacecraft from its Windham, NY facility.