Exhibit A – Narrative Supplement
STA Request
Applicant: Kongsberg Satellite Services AS
Call Sign: E260377

Kongsberg Satellite Services AS ("KSAT") respectfully requests an additional 180-day special temporary authorization ("STA") for its earth station in Fairbanks, Alaska (call sign E260377) ("Station") to continue supporting launch and early orbit-phase operations ("LEOPs") of the USPWSA-T1TL satellites supplied by York Space Systems ("Satellites") for the U.S. Space Development Agency ("SDA").

KSAT requests that the 180-day STA be granted by July 7, 2026, which is the day immediately following the expiration of the current 180-day STA,[1] for a term of July 7, 2026 to January 2, 2027, in order for KSAT to continue its mission-critical LEOPs support for the Satellites in the interest of U.S. national security.

The technical parameters requested for this STA, including frequencies, are those authorized for the current STA.

The first plane (i.e., batch) of the Satellites was launched on September 10, 2025. The second plane of the Satellites is expected to launch no earlier than July 17, 2026. This STA is intended to cover both planes of Satellites.

KSAT provides TT&C for LEOPs during commissioning of the Satellites under contract to York Space Systems ("York"), the prime contractor to SDA for the Satellites, and will continue to do so under the requested STA. The Satellites are part of SDA's Tranche 1 Transport Layer program, which serve an important national security communications purpose. SDA will take delivery of the Satellites after commissioning.

On May 15, 2026, KSAT applied for a license to support both the commissioning (LEOPs) and operation of SDA's satellites for the Tranche 1 Transport Layer and the Tranche 1 Tracking Layer programs, which would include supporting LEOPs and operation for York's Satellites.[2]

Because the Satellites will be used and operated (after LEOPs) by the U.S. Government, the frequencies for their operation have been coordinated through NTIA.

KSAT is told that the U.S. Government's Advance Publication Information[3] submitted on November 15, 2023 covers the Station.

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1 Application of Kongsberg Satellite Services AS for Special Temporary Authority for a Fairbanks, AK Earth Station, ICFS File No. SES-STA-20251117-00943 (granted Jan. 7, 2026 for a term of Jan. 8, 2026 to July 6, 2026).

2 Application of Kongsberg Satellite Services AS for a License for a Fairbanks, AK Earth Station, ICFS File No. SES-LIC-20260505-01248 (filed May 15, 2026).

In the event that KSAT continues operations under Section 1.62 pending grant of this STA request, KSAT will operate under the terms of the current STA.

Frequencies Requested

The following table lists the frequencies requested for this STA:

Band	Use	Ctr. Freq. (MHz)	Freq. Range (MHz)	Emission Designator	Polarization
S-band	TT&C (Earth-to-space)	2049.00	2048.7800-2049.2200, 2048.6500-2049.3500	440KG1D, 700KG1D	RHCP
S-band	TT&C (Earth-to-space)	2049.50	2049.2800-2049.7200, 2049.1500-2049.8500	440KG1D, 700KG1D	RHCP
S-band	TT&C (Earth-to-space)	2050.00	2049.7800-2050.2200, 2049.6500-2050.3500	440KG1D, 700KG1D	RHCP
S-band	TT&C (space-to-Earth)	2223.70	2223.2000-2224.2000, 2223.0750-2224.3250	1M00G1D, 1M25G1D	RHCP
S-band	TT&C (space-to-Earth)	2225.70	2225.2000-2226.2000, 2225.0750-2226.3250	1M00G1D, 1M25G1D	RHCP
S-band	TT&C (space-to-Earth)	2227.45	2226.9500-2227.9500, 2226.8250-2228.0750	1M00G1D, 1M25G1D	RHCP

KSAT requests authorization for the frequencies in the table above in accordance with the NTIA coordination. *These are the same center frequencies and bandwidths authorized for the current STA*[4] and the same as those requested in the pending license application for supporting York during the commissioning (LEOPs) phase.[5]

The point of contact for frequency coordination at SDA will be provided in a separate email to the Commission.

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[3] Advance Publication Information for USPWSA-T1TL, ITU Submission Ref. No. USA2023-64624 (Nov. 15, 2023), https://www.itu.int/ITU-R/space/asreceived/Publication/DisplayPublication/53644; USPWSA-T1TL (MOD-1)-5, ITU Submission Ref. No. USA2025-75754 (Aug. 13, 2025), https://www.itu.int/ITU-R/space/asreceived/Publication/DisplayPublication/63265, API/A (IFIC 3014, Feb. 6, 2024), API/A MOD 2 (IFIC 3069, Apr. 14, 2026).

[4] *See supra* note 1.

[5] *See supra* note 2, at 3.

KSAT will operate the Station under the STA on a non-interference basis.

KSAT is attaching the frequency coordination report for the Station that was submitted with the license application[6] as **Exhibit B**. The report addresses the 440 kHz and 700 kHz uplink channels listed in the table above.

Station Specifications

The Station uses a 5.0 meter antenna from Orbital Systems. The Station is hosted at the Vantor-RGTAK site in Fairbanks, Alaska. The specifications for the Station are as follows:

Site Address: 699 Wayne Williams Lane, Fairbanks, AK 99712
Site Coordinates: 64° 53′ 26.53″ N, 147° 31′ 42.96″ W (NAD-83)
Site Elevation (AMSL): 218 meters

5.0m S-band Antenna:
Name: FB4
Make/Model/Diameter of Antennas: Orbital Systems, 5.0AE3BP, 5.0 m diameter
Antenna Height Above Ground Level: 9.9 meters
Antenna Height Above Sea Level: 228.1 meters
Antenna Size: 5.0 meter diameter
Total Input Power at Antenna Flange: 25.12 watts (max.)
Antenna Gain Transmit and/or Receive: 37.6 dBi at 2075 MHz
Total EIRP for all carriers (dBW): 51.6 dBW (max.)
Antenna Azimuth Angle Western Limit / Eastern Limit: 0° / 360° (for all frequencies)
Antenna Elevation Angle Western Limit / Eastern Limit: 5° / 5° (for all frequencies)
Maximum EIRP Density (dBW/4kHz)[7]: 31.19 (at 440 kHz), 29.17 (at 700 kHz)
Maximum EIRP Density toward the Horizon (dBW/4kHz): 2.48 (at 440 kHz), 0.46 (at 700 kHz)

The Station will be remotely operated and controlled from KSAT's Tromsø Network Operations Center in Tromsø, Norway, which can be reached 24/7 at (+47) 77 60 02 68. KSAT Inc., a U.S. entity, can be reached 24/7 at +1 (720) 704-8456 (stop buzzer).[8] KSAT meets the conditions

6 *See supra* note 2.

7 These values are for operation of the Station with the York Satellites. The overall maximum EIRP Density from the Comsearch report (Exhibit B) is 36.3 dBW/4 kHz. As stated in the Comsearch report, the Horizon Gain is 8.89 dBi for both 440 kHz and 700 kHz bandwidths.

8 KSAT has appointed its U.S. subsidiary, KSAT Inc., to serve as a 24 hours per day, 7 days per week U.S. point of contact. KSAT Inc. is a Delaware corporation with offices in Colorado staffed by U.S.

listed in Section 25.271 of the Commission's rules for operation of a transmitting earth station by remote control.

The Station will operate with the Satellites on a bent-pipe basis. Commands for the Satellites will be created by York and sent encrypted to KSAT's earth station for transmission to the Satellites. Telemetry will be received at the Station from the Satellites in encrypted form and transmitted to York.

The Satellites will be launched in two planes, 21 satellites per launch, with the first launch having occurred on September 10, 2025. The second launch may occur as soon as mid-July 2026, within the requested term for the STA. LEOPs for the Satellites is expected to take approximately 6 months post-launch.

The Satellites will be in a 995.26 km circular non-geostationary orbit, inclined at 81.28 degrees.

Waiver Request

KSAT requests a waiver for the planned operations in S-band to the extent the planned use does not conform to the U.S. Table of Frequency Allocations.[9] The Commission may grant a waiver of its rules for good cause shown.[10]

The frequency ranges in the table above, which fall within the 2025-2110 MHz and 2200-2290 MHz segments of the S-band, are allocated for the Space Operations Service (Earth-to-space and space-to-Earth, respectively) for Federal users only.[11]

The use of the requested frequencies by KSAT to provide LEOPs for the Satellites is in the public interest, as demonstrated below. The risk of harmful interference is *de minimis* because the S-band transmit-frequencies have been coordinated through COMSEARCH and the operation will be coordinated through NTIA by SDA. For these reasons, there is good cause for the Commission to grant a waiver for the requested operations to the extent needed.

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citizens. KSAT Inc. has been authorized by KSAT to cease operations at the Station in the event it is notified of harmful interference or is otherwise ordered to do so by the Commission. KSAT Inc. will cease operations at the Station by calling KSAT's 24/7 Tromsø Network Operation Center, which remotely operates the station.

9 47 C.F.R. § 2.106.

10 47 C.F.R. § 1.3.

11 *See* 47 C.F.R. § 2.106. KSAT notes that footnote US347 does not apply: the footnote allows for authorization of non-Federal Earth-to-space transmissions in the space research and Earth exploration-satellite services subject to such conditions as may be applied on a case-by-case basis.

Public Interest

Grant of this STA request will serve the public interest in accordance with Section 25.120(b)(1) of the Commission's rules. The Satellites are part of SDA's Tranche 1 Transport Layer program and will be delivered to SDA after commissioning. Without the Station to support LEOPs, the commissioning of the Satellites will be hampered to the detriment of critical U.S. national security interests. For these reasons, KSAT respectfully requests that the Commission grant this STA by July 7, 2026.

Applicant Legal and Technical Qualifications

KSAT, of Tromsø, Norway, operates a global network of ground stations for satellite TT&C and data acquisition and launch and early orbit phase services. KSAT is a commercial limited liability stock company, organized under the laws of Norway. KSAT is an existing Commission licensee.

Antenna Notification Requirement

KSAT affirms that prior FAA notification is not required for the earth station. KSAT's S-band antenna stands 9.9 meters (max.) above ground level. Fort Wainwright, which has an active airfield, is approximately 4 miles away (over 21,000 feet from the nearest point of the nearest runway). Prior FAA notification of the antenna is not required because the antenna is shielded from the nearest airfield by topographic features that are greater in height: a ridge that varies between 213 and 244 meters in elevation lies between the earth station site (218 meters AMSL) and the airfield at Fort Wainwright (137 meters). Furthermore, there is an existing antenna structure operated by Vantor at the site that is approximately 228.1 meters in height above sea level, the same as KSAT's antenna.