

Exhibit A – Narrative Supplement
STA Request
Applicant: Kongsberg Satellite Services AS
Call Sign: E240138

Kongsberg Satellite Services AS (“KSAT”) respectfully requests an additional 60-day special temporary authorization (“STA”)¹ to operate a satellite earth station in Fairbanks, Alaska (call sign E240138) (“Station”) to support the YAC-1 satellite constellation (call sign S3181²) (“Satellites”), which is operated by Loft Orbital Solutions Inc. (“Loft Orbital”), pending grant of the license application, as amended.³ The pending license application for the Station was placed on Accepted for Filing Public Notice on April 2, 2025.

YAC-1 is a 10-satellite constellation designed to support Loft Orbital’s earth observation payload customer, EarthDaily Analytics Corp.⁴ Loft Orbital’s license for the Satellites was granted on May 5, 2025⁵ and the first of the Satellites launched on June 23, 2025. The Station will provide TT&C and payload communication services for the Satellites, which operate in the Earth exploration-satellite service (“EESS”).

KSAT requests that the STA term begin on July 19, 2026, immediately following the expiration of the current STA,⁶ and to run through September 16, 2026.

KSAT will operate the Station under the STA in accordance with the license application for the Station, as amended. Please see Form 312, Schedule B, included with this STA request, for additional information.⁷

¹ 47 C.F.R. § 25.120.

² Stamp Grant, Loft Orbital Solutions Inc., ICFS File No. SAT-MOD-20260310-00120 (granted June 9, 2026) (“Loft Orbital License”). *See also* Application of Loft Orbital Solutions Inc. for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in the Earth-Exploration Satellite Service, ICFS File No. SAT-LOA-20230824-00211 (Aug. 24, 2023) (“Loft Orbital Application”) (application for operating the YAC-1 satellite constellation (ITU satellite network USASAT-30L-3)).

³ *See* Application of Kongsberg Satellite Services AS for a License for a Fairbanks, AK Earth Station to Support Loft Orbital, ICFS File No. SES-LIC-20240717-01578 (filed July 17, 2024) (“Fairbanks License Application”). *See also* Amendment Application of Kongsberg Satellite Services AS for its License Application for a Fairbanks, AK Earth Station to Support Loft Orbital, ICFS File No. SES-AMD-20260126-00621 (filed Feb. 9, 2026) (amending the *Fairbanks License Application* to align the frequency ranges requested in the License Application to those in the Loft Orbital License and to reduce the Maximum EIRP per Carrier for the transmit bands from 54.6 dBW to 44.8 dBW); ICFS File No. SES-AMD-20241216-02664 (filed Dec. 16, 2024) (amending the *Fairbanks License Application* to revise the requested frequency specifications).

⁴ *See Loft Orbital Application*, Narrative, at 3.

⁵ *See Loft Orbital License*, at 1.

⁶ *See* Application of Kongsberg Satellite Services AS for Special Temporary Authority for a Fairbanks, AK Earth Station, ICFS File No. SES-STA-20260428-01197 (granted May 20, 2026 for a term of May 20, 2026 to July 18, 2026).

⁷ The transmit frequency ranges listed in Form 312, Schedule B have had the upper limit raised by 0.001 MHz due to errors in the ICFS form. The correct frequency ranges are listed in the table in the

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The Station will transmit in the 2025-2110 MHz band (“S-band”) and receive in the 8025-8400 MHz band (“X-band”).⁸ The frequencies requested by KSAT for the Station are also listed in Loft Orbital’s license for the Satellites.⁹ The Station is listed in Loft Orbital’s license as one of the commercial earth stations that it has coordinated with Federal operators.¹⁰

KSAT will comply with the conditions of the license for the Satellites, as applicable. Under the STA, KSAT will operate the Station on a non-interference basis.

Frequencies Requested and Antenna Details

The following table provides a list of the frequencies requested for this STA:

Band	Use	Center Frequency (MHz)	Freq. Range (MHz)	Polarization	Bandwidth (MHz)
S-band	Bus TT&C uplink (Earth-to-space)	2065.35	2065.29 - 2065.41	LHCP/RHCP	0.120
		2069.35	2069.29 - 2069.41	LHCP/RHCP	0.120
		2071.35	2071.29 - 2071.41	LHCP/RHCP	0.120
	Payload uplink (Earth-to-space)	2069.35	2069.05 - 2069.65	RHCP	0.600
		2071.35	2071.05 - 2071.65	RHCP	0.600
X-band	Payload downlink (space-to-Earth)	8183.00	8039.00 - 8327.00	LHCP/RHCP	288

Frequencies Requested and Antenna Details section. When using the correct requested frequency ranges, the Schedule B form on ICFS indicated an error for the transmit channels as follows: “The Emission Designator does not fit inside the frequency band.”

⁸ These bands have EESS allocations for non-Federal use: 47 C.F.R. § 2.106(c)(258) (footnote US258: “In the bands 8025-8400 MHz and 25.5-27 GHz, the Earth exploration-satellite service (space-to-Earth) is allocated on a primary basis for non-Federal use. Authorizations are subject to a case-by-case electromagnetic compatibility analysis.”); 47 C.F.R. § 2.106(c)(347) (footnote US347: “In the band 2025-2110 MHz, non-Federal Earth-to-space and space-to-space transmissions may be authorized in the space research and Earth exploration-satellite services subject to such conditions as may be applied on a case-by-case basis. Such transmissions shall not cause harmful interference to Federal and non-Federal stations operating in accordance with the Table of Frequency Allocations in this section.”).

⁹ See *Loft Orbital License*, Frequencies.

¹⁰ See *Loft Orbital License*, Condition 2 and Attachment to Grant, Appendix A.

The transmit frequency ranges listed in Form 312, Schedule B have had the upper limit raised by 0.001 MHz due to errors in the ICFS form.¹¹ The correct frequency ranges are as listed in the table above.

The frequencies requested for the Station in the table above match the frequencies in Loft Orbital's license for the Satellites (except that the 2200-2290 MHz S-band downlinks authorized for outside the U.S. only are not included).¹²

KSAT coordinated the planned transmit frequencies for the Station and submits the updated COMSEARCH Frequency Coordination Report that was filed with the February 9, 2026 amendment application as **Exhibit B** (ExhBFreqCoordReptV2).

KSAT has coordinated the Station operations with the Society of Broadcast Engineers.¹³

The Station's transmit operations in the EESS will be conducted on a non-interference basis with respect to all other Federal and non-Federal systems operating on a primary or secondary basis, in accordance with the requirements of Footnote US347 of the U.S. Table of Frequency Allocations.¹⁴

In the 2025-2110 MHz transmit band, the maximum EIRP will be 44.8 dBW and the maximum EIRP towards the horizon will be as noted in Form 312, Schedule B. No random access techniques will be used. The half-power beam width of the antenna is 1.98° @ 2075 MHz (S-band transmit) and 0.49° @ 8200 MHz (X-band receive).

For reference, KSAT submits the antenna radiation hazard analysis it filed via ICFS with its license application amendment on December 16, 2024, as **Exhibit C** (ExhCRadHazV2).

Station Specifications

The Station uses a single 5.0 meter antenna from CPI Satcom Orbital Systems (ID: FB5). The Station is hosted at a site operated by Iridium LLC in Fairbanks, Alaska, specifically:

Site Address: 900 Bidwell Ave, Fairbanks, AK 99703

Site Coordinates: 64° 49' 3.7" N, 147° 43' 9" W (NAD-83)

Please see Form 312, Schedule B, for additional Station specifications.

¹¹ See *supra* note 7.

¹² See *Loft Orbital License*, Attachment to Grant, Frequencies.

¹³ See *Loft Orbital License*, Condition 3.

¹⁴ See 47 C.F.R. § 2.106(c)(347), *supra* note 8.

Remote Control Point

The Station, consisting of a single antenna, is located at a site operated by Iridium LLC (phone for the Iridium site: +1.907.451.9841). The local Iridium 24/7 contact with the ability and authority to cease transmissions (stop buzzer) is Blaine Bronson (+1.907.347.2352). The site address is 900 Bidwell Ave, Fairbanks, AK 99703.

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's manager for the Station is Kenneth Johansen, who can be reached by cell at (+47) 92 84 56 84. KSAT meets the conditions listed in Section 25.271 of the Commission's rules for operation of a transmitting earth station by remote control.

Applicant Legal and Technical Qualifications

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

Public Interest

Grant of this STA request will serve the public interest in accordance with Section 307(a) of the Communications Act.¹⁵ The requested STA for the Station is needed to allow KSAT to begin providing earth station services for the Satellites using the Station pending grant of the license application, which will further Loft Orbital's goal of providing innovative "end-to-end missions 'as a service'" and to reduce "the time, cost, and complexity for organizations to access space."¹⁶ For these reasons, we respectfully request that the Commission grant this STA request for a term beginning on July 19, 2026.

Antenna Notification Requirement

KSAT affirms that prior FAA notification is not required for the Station. KSAT's Station consists of a single S-band antenna that stands approximately 6.9 meters in height above ground level. Ladd Army Airfield at Fort Wainwright is approximately 2.6 miles away (over 13,600 feet from the nearest point of the nearest runway) from the antenna. Fairbanks International Airport is over 3.5 miles away (over 19,000 feet from the nearest point of the nearest runway).

¹⁵ 47 U.S.C. § 307(a).

¹⁶ See *Loft Orbital Application*, Narrative, at 1.

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Prior FAA notification of the Station is not required because the Station will not adversely affect safety in air navigation. KSAT's antenna is shielded from Ladd Army Airfield and Fairbanks International Airport by existing antenna structures¹⁷ at the Iridium site that are 11.5 meters in height (from ground to top of radome), which exceed the 6.9 meter height of KSAT's antenna, and other structures on neighboring parcels to the site that also exceed the height of KSAT's antenna. The site is located in a central part of Fairbanks and there are many buildings and trees between the site and the two airfields. Furthermore, KSAT's antenna will not exceed an imaginary surface extending outward at a slope of 100 to 1 from the nearest runway¹⁸ of either Ladd Army Airfield or Fairbanks International Airport, which each have runways exceeding 0.98 km in length.

¹⁷ See 47 C.F.R. § 17.7(e)(1) (FAA notification is not required for “[a]ny object that will be shielded by existing structures of a permanent and substantial nature or by natural terrain or topographic features of equal or greater height, and will be located in the congested area of a city, town, or settlement where the shielded structure will not adversely affect safety in air navigation”).

¹⁸ See 47 C.F.R. § 17.7(b) (requiring FAA notification for “[a]ny construction or alteration that exceeds an imaginary surface extending outward and upward at any of the following slopes: (1) 100 to 1 for a horizontal distance of 6.10 kilometers (20,000 feet) from the nearest point of the nearest runway of each airport described in paragraph (d) of this section with its longest runway more than 0.98 kilometers (3,200 feet) in actual length, excluding heliports.”).