

Haras Development E181423

Request for 30-day Special Temporary Authority (“STA”)

Haras Developments (“Haras”) respectfully seeks 30 days of STA, beginning no later than November 1, 2026, to provide telemetry, tracking, and command (“TT&C”) and launch and early orbit phase (“LEOP”) services for MDA Space’s Canadian-licensed CHORUS-C remote sensing satellite from its fixed earth station located in Dublin, Ohio (the “Dublin Earth Station”; Call Sign E181423).¹

CHORUS-C will be launched from Vandenberg Space Force Base on a SpaceX Falcon9 mission and into low Earth orbit at an approximate altitude of 600 km, after which the spacecraft will orbit for approximately 93 days while testing various subsystems before entering into service. Launch is currently estimated to occur in late 2026.

Haras has been asked by MDA Space to provide support for TT&C and LEOP operations, which Haras proposes to provide using the X- and S-band frequencies listed below. MDA Space will coordinate operations with co-frequency satellite operators in proximity to the CHORUS-C spacecraft, and Haras will take all reasonable steps to eliminate harmful interference to or from its Earth station.

Grant of this STA is in the public interest because it will enable Haras to support MDA Space in accordance with its mission objectives.

Waiver Request

To the extent necessary, Haras requests waiver of Section 25.137 of the Federal Communications Commission’s (“FCC” or “Commission”) rules, which requires Earth station applicants requesting authority to communicate with a non-U.S. licensed space station to demonstrate that U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services in the space station’s licensing country.² The Commission may waive any of its rules if

¹ See *Haras Development*, Stamp Grant, ICFS File No SES-MOD-20191021-01351 (granted Jan. 30, 2024).

² 47 C.F.R. § 25.137. Because Haras will provide TT&C and LEOP services on a temporary basis, and not a commercial service, it understands that Section 25.137 may not apply, and that rule waiver may not be necessary. The Commission has granted similar applications for STA without requiring a market access analysis or rule waiver. See, e.g., *Moynk Developments*, Stamp Grant, SES-STA-20250122-00084 (Apr. 30, 2025) (granting Moynk 30 days of STA to communicate with the Indian Space Research Organisation’s Gaganyaan-1 satellite); *Maris Developments*, Stamp Grant, SES-STA-20210525-00848 (July 19, 2021) (granting Maris 30 days of STA to communicate with the Italy-licensed ION SCV-003 spacecraft); *Intelsat License LLC, as debtor-in-possession*, Stamp Grant, SES-STA-20200103-00016 (Jan. 15, 2020) (granting Intelsat 30-day STA to provide LEOP services for French-licensed space station BB4A). Haras seeks waiver here out of an abundance of caution and only to the extent necessary.

there is “good cause” to do so.³ Waiver is appropriate where “special circumstances warrant a deviation from the general rule” and “such deviation will serve the public interest” better than strict adherence to the rule.⁴ Generally, the Commission will grant a waiver of its rules if the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest.⁵ The Commission may also consider potential hardship, equity, or policy implementation factors as part of its review.⁶

Good cause exists to waive Section 25.137 of the Commission’s rules. The purpose of Section 25.137 is to ensure that U.S.-licensed satellite systems “have effective competitive opportunities” to provide “analogous services” in the licensing country of space station.⁷ Waiver in this case would not undermine the policy objective of Section 25.137. Pursuant to this STA, the Dublin Earth Station will communicate with the CHORUS-C satellite on a temporary basis and only for purposes of providing TT&C and LEOP support—not for purposes of providing a commercial service in the U.S. Additionally, Canada is a member of the World Trade Organization and has endorsed the Organization’s trade principles.⁸

The public interest would be served by grant of this STA request and, to the extent necessary, request for waiver of Section 25.137. Allowing Haras to support MDA Space and its CHORUS mission would align with current Commission initiatives by expanding economic and growth opportunities in the emerging Ground-Station-as-a-Service (“GSaaS”) market in the United States.⁹ In turn, these expanded opportunities will drive meaningful benefits for the broader U.S. space industry by giving U.S. GSaaS operators more room to develop stronger, more sustainable business models and broaden their service offerings.

Earth Station Location

The Dublin Earth Station is located at:

40° 6’ 01.911” N

83° 11’ 51.177” W

³ 47 C.F.R. § 1.3.

⁴ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast Cellular*).

⁵ See *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969) (*WAIT Radio*); *Northeast Cellular*, 897 F.2d at 1166.

⁶ See *WAIT Radio*, 418 F.2d at 1159.

⁷ 47 C.F.R. § 25.137.

⁸ See World Trade Organization, *Members and Observers*, available at https://www.wto.org/english/thewto_e/whatis_e/tif_e/org6_e.htm (last visited June 1, 2026).

⁹ The Commission has recognized the crucial role that GSaaS operators play in the U.S. space industry and has made recent efforts to “accelerate the development of neutral-host ground infrastructure that has proven successful in the wireless industry and reduces filing requirements for satellite operators.” See, e.g., *FCC Streamlines Space Processes, Boosts Innovation*, News Release, IB Docket Nos. 22-411, 22-271 (Aug. 7, 2025).

Frequency Information

The Dublin Earth Station would communicate with CHORUS-C utilizing the following frequencies:

Uplink

Center Frequency: 2053.4583 MHz

Emission Designator: 200KG1D

Polarity: RHCP

Max EIRP Per Carrier (dBW): 45.0

Max EIRP Density Per Carrier (dBW/4 kHz): 28.01

Downlink

Center Frequency: 8100 MHz

Emission Designator: 130MG1D

Polarity: RHCP

Center Frequency: 8285 MHz

Emission Designator: 130MG1D

Polarity: RHCP

Stop Buzzer

The Stop Buzzer POC for this STA is:

Operations Center

(206) 399-1834