



ATLAS Space Operation, LLC
10850 E. Traverse Highway, Suite 3355
Traverse City, Michigan 49684-1363

August 5, 2026

TO: Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Request for Special Temporary Authority

Dear Ms. Dortch,

Pursuant to Section 25.120 of the Commission's Rules, ATLAS Space Operations, Inc (ATLAS) requests Special Temporary Authority (STA) for One Hundred Eighty (180) days or until a fixed license is granted, commencing upon grant for the operation of our satellite earth station in Utqiagvik, Alaska (call sign E202173) to communicate with the Starfish Otter 24C (S00782 SAT-LOA-20251230-00413).

This request is of a temporary nature to cover the period of time until the pending SES-MOD-20260203-01109 is acted on and a new earth station license modification can be submitted to add this point of communication.

Call sign: S00782 (Common name Otter 24C)

Licensed: SAT-LOA-20251230-00413 dated July 30, 2026

Launch date: October 2026

ATLAS earth station location: E202137 (Utqiagvik, Alaska).

Frequency Coordination: report attached dated July 28, 2026 including coordination with Society of Broadcast Engineers.

OTTER 24C

Transmission Direction	Satellite	Lower	Center Frequency (MHz)	Upper	Emission	Polarity	Max EIRP per carrier (dBW)	Max EIRP density per carrier (dBW/4kHz)
earth-to-space	Otter 24C	2026.5 2026.7705 2026.9495	2027 2027 2027	2027.5 2027.2295 2027.0505	1M00F1D 459KF1D 101KF1D	RHCP RHCP RHCP	58.1 58.1 58.1	34.1 37.5 44.1
earth-to-space	Otter 24C	2048.0 2048.2705 2048.4495	2048.5 2048.5 2048.5	2049.0 2048.7295 2048.5505	1M00F1D 459KF1D 101KF1D	RHCP RHCP RHCP	58.1 58.1 58.1	34.1 37.5 44.1
earth-to-space	Otter 24C	2102.5 2102.7705 2102.9495	2103 2103 2103	2103.5 2103.2295 2103.0505	1M00F1D 459KF1D 101KF1D	RHCP RHCP RHCP	58.1 58.1 58.1	34.1 37.5 44.1



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space-to-earth	Otter 24C	8485.61	8490	8494.39	8M78G1D	RHCP	-	-
		8486.325	8490	8493.675	7M35G1D	RHCP	-	-
		8488.605	8490	8491.395	2M79G1D	RHCP	-	-
		8489.485	8490	8490.515	1M03G1D	RHCP	-	-

Operation of the Utqiagvik earth station will enable frequent, predictable contact with the spacecraft to support potential collision avoidance, perform orbit maintenance, and conduct payload operations.

If approved, communications will be on a secondary non-interference basis and we will discontinue operation in the event of any reported interference.

24 hour contact information for the Utqiagvik earth station is as follows: +1 231 598 6184 x222

Clint Schlegel, +1 231 631 5983, clint.schlegel@atlasspace.com

Operations Office - +1 231 598 6184 x 222 or
+1 877 392 8527 x 222
ops@atlasspace.com

Respectfully Submitted,

Clint Schlegel

Clint Schlegel
Head of Licensing and Regulatory
ATLAS Space Operations

Enclosure: 1) Utqiagvik, Alaska frequency coordination report dated July 28, 2026
2) S00782 grant dated July 30, 2026

FREQUENCY COORDINATION AND INTERFERENCE ANALYSIS REPORT

Prepared for
Atlas Space Operations, Inc.
UTQIAGVIK, AK
Satellite Earth Station

Prepared By:
COMSEARCH
21515 Ridgetop Circle, Suite 300
Sterling, VA 20166
July 28, 2026

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1. CONCLUSIONS

An interference study considering all existing, proposed and prior coordinated microwave facilities within the coordination contours of the proposed earth station demonstrates that this site will operate satisfactorily with the common carrier microwave environment. Further, there will be no restrictions of its operation due to interference considerations.

2. SUMMARY OF RESULTS

A number of great circle interference cases were identified during the interference study of the proposed earth station. Each of the cases, which exceeded the interference objective on a line-of-sight basis, was profiled and the propagation losses estimated using NBS TN101 (Revised) techniques. The losses were found to be sufficient to reduce the signal levels to acceptable magnitudes in every case.

3. SUPPLEMENTAL SHOWING

Pursuant to Part 25.203(c) of the FCC Rules and Regulations, the satellite earth station proposed in this application was coordinated by Comsearch using computer techniques and in accordance with Part 25 of the FCC Rules and Regulations.

Coordination data for this earth station was sent to the below listed carriers with a letter dated 06/23/2026.

Company

3G Wireless, LLC
Aerial Video Systems
Accelerated Media Technologies, Inc.
Alaska Public Media
Ascent Media Network Services, LLC
Bellsouth Telecommunications, Inc.
Borgeson, Tom R.
Broadcast Sports Inc.
Carolina Telephone and Telegraph Co
Casper, John
Cowboys Stadium LP
DCI II, INC.
Denali Media Anchorage, Corp
Fine Satellites & Fiber, LLC
Global Telecom & Technology Americas, In
Goodyear Tire & Rubber Company
Gray Televisions Licensee, LLC (KTVF)
Heiden, William
Indiana Bell Telephone Company
Kentucky RSA #3 Cellular General Partner
Kentucky RSA #4 Cellular General Partner
KTTY License LLC
Lehman, Ronald G
Lumen Technologies Inc
Michigan Bell Telephone Company
Microwave Video Systems, LLC
NorthWest Suburbs Community Access Corp
Ohio Bell GTelephone Company
Onboard Images
Pacific Bell Tel Com dba AT&T California
Quick Link Connections Inc.
Qwest Corporation
RCC Minnesota Inc. - MN NE ND SD
RF Film, Inc
Remote Facilities Consulting Services
SayRabbit LLC
SBE Coordinator
Southwestern Bell Telephone L.P.
TTWN Networks, LLC
VERIZON SOUTH INC.

Verizon Maryland, Inc.
Verizon New England Inc.
Verizon New Jersey, Inc.
Verizon New York, Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania, Inc.
Verizon Virginia, Inc.
Verizon Washington DC, Inc.
Winged Vision Inc
Wisconsin Bell Telephone Company
Wolfe Air Aviation

4. EARTH STATION COORDINATION DATA

This section presents the data pertinent to frequency coordination of the proposed earth station that was circulated to all carriers within its coordination contours.

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Date: 07/28/2026
Job Number: 260623COMSGE05

Administrative Information

Status: ENGINEER PROPOSAL
Call Sign:
Licensee Code: ATLSPC
Licensee Name: Atlas Space Operations, Inc.

Site Information

Venue Name: **UTQIAGVIK, AK**
Latitude (NAD 83): 71° 16' 30.4" N
Longitude (NAD 83): 156° 48' 22.0" W
Climate Zone: A
Rain Zone: 2
Ground Elevation (AMSL): 17.0 m / 55.8 ft

Link Information

Satellite Type: Low Earth Orbit
Mode: TO - Transmit-Only
Modulation: Digital
Minimum Elevation Angle: 5.0°
Azimuth Range: 0.0° to 360°
Antenna Centerline (AGL): 7.0 m / 23.0 ft

Antenna Information

Transmit - FCC32
Manufacturer: Gaia
Model: 3.7 meter
Gain / Diameter: 35.0 dBi / 3.7 m
3-dB / 15-dB Beamwidth: 2.60° / 5.00°

Max Available RF Power: (dBW/4 kHz) 19.1
(dBW/MHz) 43.1

Maximum EIRP: (dBW/4 kHz) 54.1
(dBW/MHz) 78.1

Interference Objectives: Long Term -154.0 dBW/4 kHz 20%
Short Term -131.0 dBW/4 kHz 0.0025%

Frequency Information

Emission / Frequency Range (MHz): 10K0G1D - 5M00G1D / 2025.0 - 2120.0

Max Great Circle Coordination Distance: 220.0 km / 136.7 mi
Precipitation Scatter Contour Radius: 466.3 km / 289.7 mi

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Coordination Values

UTQIAGVIK, AK

Licensee Name Atlas Space Operations, Inc.
Latitude (NAD 83) 71° 16' 30.4" N
Longitude (NAD 83) 156° 48' 22.0" W
Ground Elevation (AMSL) 17.0 m / 55.8 ft
Antenna Centerline (AGL) 7.0 m / 23.0 ft
Antenna Model 3.7 meter
Antenna Mode Transmit 2.0 GHz
Interference Objectives: Long Term -154.0 dBW/4 kHz 20%
Short Term -131.0 dBW/4 kHz 0.0025%
Max Available RF Power 19.1 (dBW/4 kHz)

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 2.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	0.00	34.37	14.40	220.00
5	0.00	31.26	14.40	220.00
10	0.00	28.63	14.40	220.00
15	0.00	26.62	14.40	220.00
20	0.00	25.39	14.40	220.00
25	0.00	25.05	14.40	220.00
30	0.00	25.63	14.40	220.00
35	0.00	27.08	14.40	220.00
40	0.00	29.26	14.40	220.00
45	0.00	32.03	14.40	220.00
50	0.00	35.24	14.40	220.00
55	0.00	38.79	14.40	220.00
60	0.00	42.59	14.40	220.00
65	0.00	46.58	14.40	220.00
70	0.00	50.71	14.40	220.00
75	0.00	54.94	14.40	220.00
80	0.00	59.26	14.40	220.00
85	0.00	63.64	14.40	220.00
90	0.00	68.07	14.40	220.00
95	0.00	72.53	14.40	220.00
100	0.00	77.03	14.40	220.00
105	0.00	81.54	14.40	220.00
110	0.00	86.06	14.40	220.00
115	0.00	90.59	14.40	220.00
120	0.00	95.12	14.40	220.00
125	0.00	99.64	14.40	220.00
130	0.00	104.15	14.40	220.00
135	0.00	108.64	14.40	220.00
140	0.00	113.09	14.40	220.00
145	0.00	117.51	14.40	220.00
150	0.00	121.88	14.40	220.00
155	0.00	126.17	14.40	220.00
160	0.00	130.38	14.40	220.00
165	0.00	134.48	14.40	220.00
170	0.00	138.42	14.40	220.00
175	0.00	142.16	14.40	220.00
180	0.00	145.63	14.40	220.00
185	0.00	148.74	14.40	220.00

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Coordination Values

UTQIAGVIK, AK

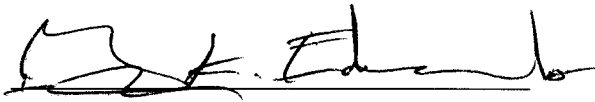
Licensee Name Atlas Space Operations, Inc.
Latitude (NAD 83) 71° 16' 30.4" N
Longitude (NAD 83) 156° 48' 22.0" W
Ground Elevation (AMSL) 17.0 m / 55.8 ft
Antenna Centerline (AGL) 7.0 m / 23.0 ft
Antenna Model 3.7 meter
Antenna Mode Transmit 2.0 GHz
Interference Objectives: Long Term -154.0 dBW/4 kHz 20%
Short Term -131.0 dBW/4 kHz 0.0025%
Max Available RF Power 19.1 (dBW/4 kHz)

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 2.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
190	0.00	151.37	14.40	220.00
195	0.00	153.38	14.40	220.00
200	0.00	154.61	14.40	220.00
205	0.00	154.95	14.40	220.00
210	0.00	154.37	14.40	220.00
215	0.00	152.92	14.40	220.00
220	0.00	150.74	14.40	220.00
225	0.00	147.97	14.40	220.00
230	0.00	144.76	14.40	220.00
235	0.00	141.21	14.40	220.00
240	0.00	137.41	14.40	220.00
245	0.00	133.42	14.40	220.00
250	0.00	129.29	14.40	220.00
255	0.00	125.06	14.40	220.00
260	0.00	120.74	14.40	220.00
265	0.00	116.36	14.40	220.00
270	0.00	111.93	14.40	220.00
275	0.00	107.47	14.40	220.00
280	0.00	102.97	14.40	220.00
285	0.00	98.46	14.40	220.00
290	0.00	93.94	14.40	220.00
295	0.00	89.41	14.40	220.00
300	0.00	84.88	14.40	220.00
305	0.00	80.36	14.40	220.00
310	0.00	75.85	14.40	220.00
315	0.00	71.36	14.40	220.00
320	0.00	66.91	14.40	220.00
325	0.00	62.49	14.40	220.00
330	0.00	58.12	14.40	220.00
335	0.00	53.83	14.40	220.00
340	0.00	49.62	14.40	220.00
345	0.00	45.52	14.40	220.00
350	0.00	41.58	14.40	220.00
355	0.00	37.84	14.40	220.00

5. CERTIFICATION

I HEREBY CERTIFY THAT I AM THE TECHNICALLY QUALIFIED PERSON RESPONSIBLE FOR THE PREPARATION OF THE FREQUENCY COORDINATION DATA CONTAINED IN THIS APPLICATION, THAT I AM FAMILIAR WITH PARTS 101 AND 25 OF THE FCC RULES AND REGULATIONS, THAT I HAVE EITHER PREPARED OR REVIEWED THE FREQUENCY COORDINATION DATA SUBMITTED WITH THIS APPLICATION, AND THAT IT IS COMPLETE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

BY: _



Gary K. Edwards
Senior Manager
COMSEARCH
21515 Ridgetop Circle, Suite 300
Sterling, VA 20166

DATED: July 28, 2026

 GRANTED* Space Bureau	File # SAT-LOA-20251230-00413	
	Call Sign: S00782 (or other identifier)	Grant Date: 07/30/2026
	From: <u>See Conditions</u>	To: <u>See Conditions</u>
	Approved: <u>Carelyn A. Mahoney</u> Acting Division Chief Satellite Programs and Policy Division	

*with conditions

GRANT
Starfish Space Inc.
 ICFS File No. SAT-LOA-20251230-00413

ICFS File No(s):	SAT-LOA-20251230-00413 ¹	GRANTED – With Conditions  Space Bureau Satellite Programs and Policy Division
Licensee/Grantee:	Starfish Space Inc. (Starfish)	
Call Sign:	S00782	
Satellite Name:	Otter 24C	
Orbital Location: (required station- keeping tolerance)	See Scope of Grant	
Administration:	United States of America	
Nature of Service:	Space Operation Service (SOS); Space Research Service (SRS)	
Scope of Grant:	Authority for radiofrequency communications to launch and operate the Otter 24C spacecraft to conduct several satellite inspection missions in low Earth orbit (LEO)	
Service Area(s):	N/A	
Frequencies:	<u>SRS (Telemetry, Tracking, and Command (TT&C)):</u> 8450-8500 MHz (space-to-Earth) (center frequency of 8490.0 MHz with bandwidths of 1032 kHz, 2800 kHz, 7355 kHz, and 8780.4 kHz) ² <u>SOS (TT&C):</u> 2025-2110 MHz (Earth-to-space) (center frequencies of 2027.0 MHz, 2048.5 MHz, and 2103.0 MHz each with bandwidths of 101.0 kHz, 459.4 kHz, and 918.8 kHz) ³	
Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications and commitments set forth by the applicant or petitioner and with the Federal Communications Commission’s rules not waived herein. This grant is also subject to the following conditions: Starfish’s requests for waiver of sections 25.122(c)(8) and 25.122(c)(12) of the Commission’s rules, 47 CFR §§ 25.122(c)(8), (12), to permit processing under the Commission’s small satellite streamlined licensing rules are DENIED.⁴ Section 25.122(c)(8) requires that a zero probability of human casualty from portions of spacecraft surviving re-entry.⁵ Section 25.122(c)(12) requires each space station covered by a streamlined application to have a mass of 180 kg or less, including any propellant.⁶ Starfish argues that even though the Otter 24C human casualty risk is greater than zero, the calculated probability of 1 in 72,000 is significantly less than the 1 in 10,000 threshold.⁷ Starfish also argues that despite the Otter 24C exceeding the 180 kg mass limit, the spacecraft remains consistent with the low risk that the streamlined small satellite rules were intended to capture.⁸ We are not persuaded that these arguments		

¹ See Starfish Space Inc., ICFS File No. SAT-LOA-20251230-00413 (filed Jan. 9, 2026) (*Application*). This application was placed on public notice on March 27, 2026. See *Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Accepted for Filing*, Public Notice, Report No. SAT-01986 (rel. Mar. 27, 2026).

² See Starfish Space, Inc., Supplement, ICFS File No. SAT-LOA-20251230-00413, at 2-3 (filed June 4, 2026) (withdrawing its request to operate downlink transmissions in the 8200-8400 MHz band from the submitted Application).

³ *Id.* at 3-4.

⁴ See *Application*, Legal Narrative at 15-18.

⁵ 47 CFR § 25.122(c)(8).

⁶ 47 CFR § 25.122(c)(12).

⁷ See *Application*, Legal Narrative at 15-16.

⁸ See *id.* at 16.

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support waiver of the Commission's small satellite streamlined licensing rules and accordingly deny these requests.

2. Starfish's request for waiver of section 2.106(a) of the Commission's rules,⁹ the U.S. Table of Frequency Allocations (U.S. Table), to conduct non-Federal space operations in the 2025-2110 MHz band (Earth-to-space) for a command uplink is GRANTED.¹⁰ The 2025-2110 MHz band in the U.S. Table, *inter alia*, includes a primary Federal allocation for SOS (Earth-to-space) and (space-to-space) and a secondary SOS (Earth-to-space) allocation for non-Federal use, with non-Federal SOS transmissions, *inter alia*, restricted under section 2.106(a), (c)(94) of the Commission's rules to telecommand use for pre-launch testing and space launch operations.¹¹ Under section 2.106(a), (c)(347) of the Commission's rules, in the 2025-2110 MHz band, non-Federal Earth-to-space and space-to-space transmissions may be authorized in the SRS and Earth exploration-satellite service, subject to such conditions as may be applied on a case-by-case basis.¹² Such transmissions must not cause harmful interference to Federal and non-Federal stations that are operating in accordance with the Table of Frequency Allocations in 47 CFR § 2.106(a). Starfish seeks to use the 2025-2110 MHz band for payload data and TT&C uplinks, and thus Starfish will not use this band exclusively for SRS.¹³ Starfish has coordinated its planned operations in the 2025-2110 MHz band with Federal users of the band,¹⁴ and this grant reflects that coordinated outcome. Starfish is authorized for these operations on an unprotected and non-interference basis, and operations pursuant to this authorization must accept interference from and not cause interference to other stations that are operating in the 2025-2110 MHz band and adjacent bands in accordance with the Table of Frequency Allocations, 47 CFR § 2.106(a), (c)(347). Upon receiving a documented report of harmful interference, Starfish must immediately cease the operations causing the harmful interference until the issue is resolved.
3. Earth station transmissions to space stations in the 2025-2110 MHz band must be coordinated with Fixed Service and Mobile Service stations in the 2025-2110 MHz band (e.g., via the Society of Broadcast Engineers (SBE)).
4. In the 2025-2110 MHz band, Starfish must comply with the following conditions:
 - a. To the extent possible, Starfish uplink (Earth-space) transmissions must use a center frequency of 2048.5 MHz;
 - b. Starfish must cease all uplink (Earth-to-space) transmissions centered at 2027.0 MHz when the ISS (NORAD ID: 25544) is within 5 degrees of the respective earth station antenna boresight; and
 - c. Starfish must cease all uplink (Earth-to-space) transmissions centered at 2027.0 MHz from the Johannesburg, South Africa earth station location when the ARCSTONE (NORAD ID: 64540) spacecraft is within 5 degrees of the earth station antenna boresight.
5. Starfish's request for a waiver of the U.S. Table, 47 CFR § 2.106(a), for its proposed communications in the 8450-8500 MHz (space-to-Earth) band to support in-space servicing, assembly, and manufacturing

⁹ 47 CFR § 2.106(a).

¹⁰ See *Application*, Legal Narrative at 22-23.

¹¹ See 47 CFR § 2.106(a), (c)(94).

¹² See 47 CFR § 2.106(a), (c)(347).

¹³ See *Application*, Legal Narrative at 5.

¹⁴ *Id.* at 6, 22.

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Starfish Space Inc.

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(ISAM) operations is GRANTED, to the extent necessary.¹⁵ In the U.S. Table, the 8450-8500 MHz band is allocated, *inter alia*, to the SRS (space-to-Earth) on a primary basis for Federal and non-Federal use.¹⁶ Starfish plans to use the 8450-8500 MHz band to downlink payload and TT&C data.¹⁷ In addition, Starfish states that it will coordinate its operations in the band with both in-band and adjacent band Federal spectrum users, a process that should be facilitated by the relatively limited scope and duration of Otter 24C's use of the band and the limited deployments in the band by other operators.¹⁸ Starfish is authorized for these operations on an unprotected and non-interference basis, and operations pursuant to this authorization must accept interference from and not cause interference to stations that are operating in the 8450-8500 MHz band and adjacent bands in accordance with the Table of Frequency Allocations, 47 CFR § 2.106(a). Upon receiving a documented report of harmful interference, Starfish must immediately cease the operations causing the harmful interference until the issue is resolved.

6. Power flux-density levels from operation in the 8450-8500 MHz band must not exceed the limits in Table 21-4 of the ITU Radio Regulations and must meet the limits/protection criteria in Recommendation ITU-R SA.1157-1.
7. Starfish's transmissions in the 2025-2110 MHz (Earth-to-space) and 8450-8500 MHz (space-to-Earth) bands, respectively, may be made only to/from Federal earth stations, or earth stations coordinated with Federal agencies, including the National Aeronautics and Space Administration (NASA), Air Force Spectrum Management Office (AFSMO), Department of Commerce/National Oceanic and Atmospheric Administration (DOC/NOAA), and Department of the Navy (DON). Any use of Federal or government-sponsored ground stations must be coordinated by Starfish with NASA (HQ-SatCoord@mail.nasa.gov), AFSMO (jimmy.nguyen@us.af.mil), and DOC/NOAA (spectrum.coordinator@noaa.gov). A list of coordinated non-Federal earth stations is attached in the Appendix to this grant. Starfish must provide the FCC with an updated list of coordinated non-Federal earth stations within ten (10) business days following any changes to this list.
8. Starfish must operate in accordance with the power levels and parameters coordinated with Federal agencies, including duty cycles.
9. Starfish must provide the FCC and other Federal agencies the initial orbital parameters (e.g., operating altitudes, inclination angle) within 30 days following launch. Notification must be provided to AFSMO (jimmy.nguyen@us.af.mil), NASA (HQ-SatCoord@mail.nasa.gov) and DOC/NOAA (spectrum.coordinator@noaa.gov). In the event that changes to orbital parameters are required, Starfish must complete coordination in advance of any such changes with AFSMO, NASA, and DOC/NOAA, and upon successful completion of coordination notify the FCC of the update within five business days.
10. Starfish's request for waiver of section 25.157(c), 47 CFR § 25.157(c), of the Commission's rules, which provides for the processing of "NGSO-like satellite systems" under a modified processing round framework, is GRANTED. Starfish is capable of sharing the spectrum in which it proposes to operate and affirms that its operations will not materially constrain future space entrants from using the authorized band(s).¹⁹ Given the opportunity for additional entrants to operate in these bands, as well as

¹⁵ *Id.* at 23-24. In a recent Notice of Proposed Rulemaking, the Commission tentatively concluded that communications supporting emergent space operations that do not have the primary aim of providing a traditional telecommunications service may justifiably fit within the SRS allocation. *Spectrum Abundance for Weird Space Stuff*, SB Docket No. 26-54, Notice of Proposed Rulemaking, FCC26-13, at para. 38 (rel. Mar. 27, 2026) (*WSS NPRM*). Until any final rules are adopted in that proceeding, we find it is in the public interest to grant Starfish a waiver of the U.S. Table to the extent necessary.

¹⁶ See 47 CFR § 2.106(a).

¹⁷ *Application*, Legal Narrative at 6.

¹⁸ *Id.* at 7, 23-24.

¹⁹ *Id.* at 19-20.

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the limits on mission duration and frequency use contained in this grant, we find that granting waiver in this instance does not undermine the purpose of the processing round rules.

11. Starfish's request for waiver of sections 25.164 and 25.165(a) of the Commission's rules, 47 CFR §§ 25.164 and 25.165(a), is GRANTED IN PART. The requirement for Starfish to post a surety bond in accordance with section 25.165 is deferred by 150 days, making the bond due a total of 180 days from the date of this authorization.²⁰ Section 25.165 requires that space station licensees post a bond within 30 days of grant of license.²¹ Starfish is expected to launch within several months of this grant.²² Additionally, Starfish will be conducting a satellite inspection mission, thereby not materially constraining the use of orbital or spectrum resources.²³ These factors provide safeguards against speculation and warehousing of orbital and spectrum resources, in much the same way a bond would. In the event that the Starfish Otter 24C has not launched and begun operations in accordance with this grant by **December 27, 2027**, Starfish must post a surety bond in satisfaction of 47 CFR §§ 165(a)(1) & (b) no later than **January 26, 2027**, and thereafter maintain on file a surety bond requiring payment in the event of a default in an amount, at minimum, determined according to the formula set forth in 47 CFR § 25.165(a)(1). We therefore find that this partial grant will not undermine the purpose of the rule.
12. Upon commencement of operations, Starfish must file a notification within five (5) days certifying to the Commission that the spacecraft has been placed in orbit and indicating whether the operations fully conform to the terms and conditions of this grant. The term of this authorization is 15 years, commencing at 3 a.m. Eastern Time on the date when Starfish notifies the Commission that operation of the Otter 24C is compliant with the license terms and conditions herein and that the space station has been placed in its authorized orbit and begun operating.

Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned.

This action is taken pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 CFR § 0.261, and is effective upon release.

Station licenses are subject to the conditions specified in Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(h).

Action Date:	July 30, 2026	
Term Dates	From: See Conditions	To: See Conditions

²⁰ 47 CFR §§ 25.165(a), (b). We note that the Division has typically granted only 60-day extensions (for a total of 90 days) of the Commission's surety bond deadline. However, because licenses are often issued further in advance of launches, primarily due to the increased speed of processing satellite license applications, the Division is granting an extension of 150 days (for a total of 180 days) to post the required bond.

²¹ 47 CFR § 25.165(a).

²² See *Application*, Legal Narrative at 20 ("[T]he Otter 24C is already manifested or launch on a rideshare mission with a launch window from October 1, 2026 to November 30, 2026.").

²³ See *id.* at 4-5.

GRANT
Starfish Space Inc.
ICFS File No. SAT-LOA-20251230-00413

Approved:

Carolyn A. Mahoney
Acting Division Chief, Satellite Programs and Policy Division

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Appendix: List of Coordinated Earth Stations

1. Blonduos, Iceland
2. Longovilo, Chile
3. Deadhorse, Alaska, USA
4. Plana, Bulgaria
5. Utqiagvik, Alaska, USA
6. Muonio, Finland
7. Dundee, Scotland
8. Awarua, New Zealand
9. Pitea, Sweden
10. Johannesburg, South Africa