



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

August 13, 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 commencing on or about December 1, 2026 for the operation of our satellite earth station in Haleiwa, Hawaii to communicate with the Starfish OTTER 24A (S3221) to provide telemetry, tracking, and command (TT&C) and payload services for their "check-out" mission. The Haleiwa earth station is located at 21-40-14.1 N, 158-02-07.1 W.

This request is of a temporary nature until the pending SES-LIC-20260611-01745 is acted on which includes this point of communication.

A frequency coordination report was completed on June 24, 2026 which included coordination with the Society of Broadcast Engineers (SBE). This report is attached.

Starfish Otter 24A S3221

Licensed: SAT-LOA-20250212-00043 dated March 12, 2026

Launch date: no earlier than January 1, 2026

ATLAS earth station location: 21-40-14.1 N, 158-02-07.1 W (Haleiwa, Hawaii)

Frequency Coordination: completed June 24, 2026

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	S3221	2048.4175 2048.4827 2048.4888	2048.5 2048.5 2048.5	2048.5825 2048.5173 2048.5112	165KF1D 34K6F1D 22K4F1D	RHCP RHCP RHCP	64.7 64.7 64.7	48.5 55.3 57.2
earth-to-space	S3221	2102.9175 2102.9827 2102.9888	2103.0 2103.0 2103.0	2103.0825 2103.0173 2103.0112	165KF1D 34K6F1D 22K4F1D	RHCP RHCP RHCP	64.7 64.7 64.7	48.5 55.3 57.2
space-to-earth	S3221	8488.96 8489.8905 8489.983	8490 8490 8490	8491.04 8490.1095 8490.017	2M08G1D 219KG1D 34K0G1D	RHCP RHCP RHCP	- - -	- - -



ATLAS Space Operation, LLC

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Traverse City, Michigan 49684-1363

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 Haleiwa, Hawaii 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) Frequency coordination report dated June 24, 2026
2) S3221 SAT-LOA-20250212-00043 dated March 12, 2026

FREQUENCY COORDINATION AND INTERFERENCE ANALYSIS REPORT

Prepared for
Atlas Space Operations, Inc.
HALEIWA, HI
Satellite Earth Station

Prepared By:
COMSEARCH
21515 Ridgetop Circle, Suite 300
Sterling, VA 20166
June 24, 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 05/21/2026.

Company

3G Wireless, LLC
Aerial Video Systems
Alascom Inc
Ascent Media Network Services, LLC
Bellsouth Telecommunications, Inc.
Borgeson, Tom R.
Broadcast Sports Inc.
Carolina Telephone and Telegraph Co
Casper, John
CenturyTel of the Southwest, Inc.
Chicago Comnet Corp
Cincinnati Bell Wireless LLC
Citywide News Network, Inc.
Cowboys Stadium LP
DCI II, INC.
Direct Broadcast Services, Inc.
Frontier California Inc.
Global Telecom & Technology Americas, Inc.
Goodyear Tire & Rubber Company
Gray Television Licensee, LLC
HF Enterprises, Inc
Hallco Unlimited, Inc.
Hawaii Public Television Foundation
Hawaiian Telecom Inc.
Heiden, William
Illinois Bell Telephone Company
Indiana Bell Telephone Company
Information & Display Systems, Inc.
Information Super Station, LLC
International Communications Group, Inc.
KITV, Inc
Kentucky RSA #3 Cellular General Partner
Kentucky RSA #4 Cellular General Partner
Lumen Technologies Inc
MERCURY COMMUNICATIONS
Michigan Bell Telephone Company
Moreen, Steven K
NEW ENGLAND DIGITAL DISTRIBUTION, INC.
NSM Surveillance
Navajo Communications Company

Nexstar Media Inc.
NorthWest Suburbs Community Access Corp
Ohio Bell GTelephone Company
Onboard Images
Pacific Bell Tel Com dba AT&T California
Penn Service Microwave Co., Inc.
Plateau Telecommunications, Inc.
Plum TV, LLC
Production & Satellite Services, Inc.
Quick Link Connections Inc.
Qwest Corporation
RCC Minnesota Inc. - MN NE ND SD
RF Central, LLC
RF Film, Inc
Radiofone, Inc.
Randy Hermes Production
Remote Broadcasts, Inc.
Remote Facilities Consulting Services
SBE coordinator
Southwestern Bell Telephone L.P.
Speedshotz, Inc
TTWN Networks, LLC
Unisat, Inc.
United Telephone - Southeast
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: 06/24/2026
Job Number: 260521COMSGE06

Administrative Information

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

Site Information

HALEIWA, HI

Venue Name:
Latitude (NAD 83): 21° 40' 14.1" N
Longitude (NAD 83): 158° 2' 7.1" W
Climate Zone: C
Rain Zone: 4
Ground Elevation (AMSL): 149.6 m / 490.8 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): 6.0 m / 19.7 ft

Frequency Information

Transmit 2.0 GHz

Manufacturer: Viasat
Model: 7.3FPA
Gain / Diameter: 39.4 dBi / 7.3 m
3-dB / 15-dB Beamwidth: 1.60° / 2.00°

Max Available RF Power: (dBW/4 kHz) 21.3
(dBW/MHz) 45.3

Maximum EIRP: (dBW/4 kHz) 60.7
(dBW/MHz) 84.7

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

Frequency Information

Transmit 2.0 GHz

Emission / Frequency Range (MHz):
10K0F1D / 2026.995 – 2027.005
200KF1D / 2026.9 – 2027.1
4M50G1D / 2035.25 – 2039.75
40K0G1D / 2037.48 – 2037.52
2M66G1D / 2045.17 – 2047.83
1M33G1D / 2045.835 – 2047.165
170KG1D / 2046.415 – 2046.585
512KG1D / 2046.744 – 2047.256
32K0G1D / 2046.984 – 2047.016
2M66G1D / 2047.97 – 2050.63
200KF1D / 2048.4 – 2048.6
10K0F1D / 2048.495 – 2048.505
1M00G1D / 2048.5 – 2049.5
2M00G1D / 2048.5 – 2050.5
1M33G1D / 2048.635 – 2049.965
700KG1D / 2048.65 – 2049.35
140KG1D / 2048.6796 – 2048.8204
1M50G1D / 2048.75 – 2050.25
140KG1D / 2048.7796 – 2048.9204
440KG1D / 2048.78 – 2049.22
140KG1D / 2048.8796 – 2049.0204
100KG1D / 2048.95 – 2049.05
140KG1D / 2048.9796 – 2049.1204

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700KG1D / 2049.15 - 2049.85
170KG1D / 2049.215 - 2049.385
440KG1D / 2049.28 - 2049.72
240KG1D / 2049.38 - 2049.62
160KG1D / 2049.42 - 2049.58
80K0G1D / 2049.46 - 2049.54
1M00G1D / 2049.5 - 2050.5
700KG1D / 2049.65 - 2050.35
440KG1D / 2049.78 - 2050.22
140KG1D / 2049.8796 - 2050.0204
100KG1D / 2049.95 - 2050.05
140KG1D / 2049.9796 - 2050.1204
140KG1D / 2050.0796 - 2050.2204
140KG1D / 2050.1796 - 2050.3204
180KG1D / 2052.01 - 2052.19
120KG1D / 2052.04 - 2052.16
180KG1D / 2052.91 - 2053.09
120KG1D / 2052.94 - 2053.06
100KG1D / 2052.95 - 2053.05
50K0G1D / 2052.975 - 2053.025
40K0G1D / 2052.98 - 2053.02
180KG1D / 2053.61 - 2053.79
120KG1D / 2053.64 - 2053.76
200KG1D / 2054.525 - 2054.725
500KG1D / 2059.75 - 2060.25
2M66G1D / 2061.37 - 2064.03
1M33G1D / 2062.035 - 2063.365
170KG1D / 2062.615 - 2062.785
180KG1D / 2063.875 - 2064.055
120KG1D / 2063.905 - 2064.025
180KG1D / 2064.875 - 2065.055
120KG1D / 2064.905 - 2065.025
180KG1D / 2065.875 - 2066.055
120KG1D / 2065.905 - 2066.025
2M66G1D / 2066.87 - 2069.53
1M33G1D / 2067.535 - 2068.865
170KG1D / 2068.115 - 2068.285
675KG1D / 2068.6625 - 2069.3375
270KG1D / 2068.865 - 2069.135
135KG1D / 2068.9325 - 2069.0675
200KF1D / 2071.775 - 2071.975
2M66G1D / 2073.67 - 2076.33
1M33G1D / 2074.335 - 2075.665
170KG1D / 2074.915 - 2075.085
2M66G1D / 2076.07 - 2078.73
1M33G1D / 2076.735 - 2078.065
170KG1D / 2077.315 - 2077.485
100KG7D / 2079.95 - 2080.05
200KG1D / 2080.9 - 2081.1
1M25G1D / 2095.875 - 2097.125
1M20G1D / 2095.9 - 2097.1
800KG1D / 2097.1 - 2097.9
400KG1D / 2097.3 - 2097.7
100KG1D / 2097.45 - 2097.55
1M25G1D / 2097.875 - 2099.125
1M20G1D / 2097.9 - 2099.1
200KF1D / 2102.9 - 2103.1
10K0F1D / 2102.995 - 2103.005
10K0G1D / 2109.745 - 2109.755

Max Great Circle Coordination Distance
Precipitation Scatter Contour Radius

220.0 km / 136.7 mi
348.5 km / 216.5 mi

COMSEARCH

Earth Station Data Sheet

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

Coordination Values

HALEIWA, HI

Licensee Name Atlas Space Operations, Inc.
Latitude (NAD 83) 21° 40' 14.1" N
Longitude (NAD 83) 158° 2' 7.1" W
Ground Elevation (AMSL) 149.6 m / 490.8 ft
Antenna Centerline (AGL) 6.0 m / 19.7 ft
Antenna Model Viasat 7.3FPA
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 21.3 (dBW/4 kHz)

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 2.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	0.00	72.41	3.20	220.00
5	0.00	70.74	3.20	220.00
10	0.00	69.21	3.20	220.00
15	0.00	67.83	3.20	220.00
20	0.00	66.61	3.20	220.00
25	0.00	65.58	3.20	220.00
30	0.00	64.73	3.20	220.00
35	0.00	64.09	3.20	220.00
40	0.00	63.66	3.20	220.00
45	0.00	63.44	3.20	220.00
50	0.00	63.44	3.20	220.00
55	0.27	63.93	3.20	220.00
60	0.28	64.36	3.20	220.00
65	0.29	65.00	3.20	220.00
70	0.58	66.10	3.20	220.00
75	0.85	67.33	3.20	220.00
80	1.13	68.74	3.20	220.00
85	1.44	70.29	3.20	220.00
90	1.69	71.91	3.20	220.00
95	2.02	73.68	3.20	220.00
100	2.53	75.62	3.20	220.00
105	2.71	77.43	3.20	220.00
110	2.60	79.17	3.20	220.00
115	3.31	81.29	3.20	220.00
120	3.10	83.11	3.20	220.00
125	2.98	85.02	3.20	220.00
130	3.13	87.01	3.20	220.00
135	2.99	88.99	3.20	220.00
140	2.77	91.00	3.20	220.00
145	2.07	93.09	3.20	220.00
150	2.19	95.12	3.20	220.00
155	1.96	97.19	3.20	220.00
160	2.36	99.03	3.20	220.00
165	2.42	100.89	3.20	220.00
170	2.13	102.84	3.20	220.00
175	2.17	104.57	3.20	220.00
180	2.01	106.31	3.20	220.00
185	1.80	108.00	3.20	220.00

COMSEARCH

Earth Station Data Sheet

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

Coordination Values

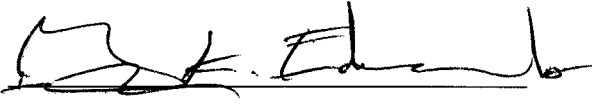
HALEIWA, HI

Licensee Name Atlas Space Operations, Inc.
Latitude (NAD 83) 21° 40' 14.1" N
Longitude (NAD 83) 158° 2' 7.1" W
Ground Elevation (AMSL) 149.6 m / 490.8 ft
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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 21.3 (dBW/4 kHz)

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 2.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
190	1.61	109.56	3.20	220.00
195	1.42	111.01	3.20	220.00
200	1.07	112.46	3.20	220.00
205	0.85	113.65	3.20	220.00
210	0.46	114.83	3.20	220.00
215	0.28	115.64	3.20	220.00
220	0.00	116.34	3.20	220.00
225	0.00	116.56	3.20	220.00
230	0.00	116.56	3.20	220.00
235	0.00	116.35	3.20	220.00
240	0.00	115.92	3.20	220.00
245	0.00	115.27	3.20	220.00
250	0.00	114.43	3.20	220.00
255	0.00	113.40	3.20	220.00
260	0.00	112.19	3.20	220.00
265	0.00	110.81	3.20	220.00
270	0.00	109.28	3.20	220.00
275	0.00	107.61	3.20	220.00
280	0.00	105.82	3.20	220.00
285	0.00	103.93	3.20	220.00
290	0.00	101.94	3.20	220.00
295	0.00	99.87	3.20	220.00
300	0.00	97.75	3.20	220.00
305	0.00	95.57	3.20	220.00
310	0.00	93.36	3.20	220.00
315	0.00	91.13	3.20	220.00
320	0.00	88.89	3.20	220.00
325	0.00	86.66	3.20	220.00
330	0.00	84.45	3.20	220.00
335	0.00	82.28	3.20	220.00
340	0.00	80.15	3.20	220.00
345	0.00	78.08	3.20	220.00
350	0.00	76.09	3.20	220.00
355	0.00	74.20	3.20	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: June 24, 2026

GRANT
Starfish Space Inc.
ICFS File No. SAT-LOA-20250212-00043

 GRANTED* Space Bureau	File # SAT-LOA-20250212-00043 Call Sign S3221 (or other identifier) Grant Date: 03/12/2026 From: See Conditions To: See Conditions Approved: <u>Jonathan R. Markman</u> Acting Division Chief Satellite Programs and Policy Division
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*with conditions

ICFS File No(s):	SAT-LOA-20250212-00043 ¹	GRANTED – With Conditions  Space Bureau Satellite Programs and Policy Division
Licensee/Grantee:	Starfish Space Inc.	
Call Sign:	S3221	
Satellite Name:	Otter 24A	
Orbital Location: (required station-keeping tolerance)	See Scope of Grant.	
Administration:	United States of America	
Nature of Service:	Space Operation; Space Research Service	
Scope of Grant:	Authority for radiofrequency operations to: (1) deploy Otter 24A into a geosynchronous transfer orbit; (2) perform orbit raising to a Graveyard Orbit approximately 350 km above the geostationary arc and rendezvous and dock with the first client spacecraft and perform a short-term station-keeping demonstration; (3) drift Otter 24A to the second client spacecraft at the 66° E.L. orbital location; (4) rendezvous and dock with the second client spacecraft in order to conduct a multi-year station keeping and satellite life-extension mission; and (5) undock from the second client spacecraft and dispose of the spacecraft by raising its orbit at end-of-life.	
Service Area(s):	N/A	
Frequencies:	<u>Space Operations</u> 8450-8500 MHz (space-to-Earth) (center frequency of 8490.0 MHz with bandwidths of 2.0 MHz, 200 kHz, 30 kHz, and 10 kHz) 2025-2110 MHz (Earth-to-space) (center frequencies of 2048.5 MHz, 2027.0 MHz, and 2103.0 MHz each with bandwidths of 200 kHz and 10 kHz) <u>Backup TT&C</u> 8025-8400 MHz (space-to-Earth) (center frequency of 8200.0 MHz with bandwidths of 2.0 MHz, 200 kHz, 30 kHz, and 10 kHz)	
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: 1. Starfish must coordinate the operations of Otter 24A with existing geostationary space stations to ensure that no harmful interference results from its operations during its drift from the Graveyard Orbit to the 66° E.L. orbital location or during its drift from the 66° E.L. orbital location to its disposal orbit. 2. Starfish's request for waiver of section 2.106(a) of the Commission's rules,² 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.³ The 2025-2110 MHz band in the U.S. Table, <i>inter alia</i>, includes a primary Federal allocation for Space Operation Service (SOS) (Earth-to-space) and (space-to-		

¹ This application was placed on public notice on April 25, 2025. See *Satellite Licensing Division and Satellite Programs and Policy Division Information, Space Station Applications Accepted for Filing*, Public Notice, Report No. SAT-01913 (Apr. 25, 2025).

² 47 CFR § 2.106(a).

³ See Legal Narrative at 22-24.

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Starfish Space Inc.

ICFS File No. SAT-LOA-20250212-00043

space), but not a non-Federal primary allocation.⁴ Starfish has coordinated its planned operations in the 2025-2110 MHz band with Federal users of the band,⁵ 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 harmful interference to other stations that are operating in the 2025-2110 MHz band and adjacent bands in accordance with the U.S. Table of Frequency Allocations, 47 CFR § 2.106(a), (c)(347).

3. In the 2025-2110 MHz band, the following conditions shall apply:
 - a. To the extent possible, Starfish Space should use a center frequency of 2048.5 MHz for its uplink (Earth-to-space) transmissions; and
 - b. Starfish Space shall not transmit in the Earth-to-space direction with a center frequency of 2027.0 MHz, from the Paumalu, Hawaii, USA; Accra, Ghana; Cordoba, Argentina; and Portland, Oregon, USA earth stations.
4. 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)).
5. Starfish's request for a waiver of the U.S. Table, 47 CFR § 2.106(a), for backup TT&C and payload data operations in the 8025-8400 MHz frequency band⁶ is GRANTED on an unprotected and non-interference basis and must comply with the conditions for operation in this band specified below. We note that the 8025-8400 MHz band is not allocated for the SOS or the Space Research Service (SRS) in either the U.S. Table or internationally.⁷ Given that Starfish plans to only use the 8025-8400 MHz band as an emergency backup for TT&C and payload data operations,⁸ and Starfish plans to operate with low duty cycles and relatively narrow channels in this band, we conclude that grant of waiver to permit these operations is in the public interest. Starfish provided a demonstration on how it can share with non-Federal operators in the band, and Starfish will coordinate with Federal operators in the band. Starfish is authorized for these operations only as an emergency backup and on an unprotected and non-interference basis, and operations pursuant to this authorization must accept interference from and not cause harmful interference to stations that are operating in the 8025-8400 MHz band and adjacent bands in accordance with the Table of Frequency Allocations. 47 CFR § 2.106(a).
6. In the 8025-8400 MHz band, the following conditions shall apply:
 - a. Operations are limited to emergency backup of the primary TT&C capability operating in the 8450-8500 MHz band; and
 - b. Power flux-density levels must not exceed the limits in No. 22.5 and Table 21-4 of the ITU Radio Regulations, must meet the limits/protection criteria in Recommendation ITU-R SA.1157-1, and must follow the guidelines in Recommendation ITU-R SA.1810.
7. Starfish's request for a waiver of the U.S. Table, 47 CFR § 2.106(a), for its proposed in-space servicing, assembly, and manufacturing (ISAM) operations in the 8450-8500 MHz (space-to-Earth) band is GRANTED to the extent necessary.⁹ The 8450-8500 MHz band is allocated to the SRS (space-to-Earth),

⁴ See 47 CFR § 2.106(a), (c)(94). Section 2.106(a), (c)(94) does provide for specified non-Federal space operations in the 2025-2110 MHz band that are not relevant here.

⁵ See Legal Narrative at 24.

⁶ See *id.* at 25.

⁷ In the U.S. Table, the 8025-8400 MHz band is allocated, *inter alia*, to the Earth Exploration-Satellite Service (EESS) (space-to-Earth) on a primary basis for Federal and non-Federal use. 47 CFR § 2.106(a).

⁸ See Legal Narrative at 25.

⁹ See Legal Narrative at 24-25.

GRANT

Starfish Space Inc.

ICFS File No. SAT-LOA-20250212-00043

inter alia, in the United States and all ITU regions, 47 CFR § 2.106(a). Starfish indicates that it also plans to use the band to downlink payload and TT&C data. 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 Otter24A's use of the band and the limited deployments in the band from other operators.¹⁰ Starfish is authorized for these operations on an unprotected and non-interference basis, and operations pursuant to this authorization must not cause harmful interference to stations operating in the 8450-8500 MHz band and adjacent bands in accordance with the U.S. Table of Frequency Allocations, 47 CFR § 2.106(a).

8. 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.
9. Starfish Space's use of earth stations is limited to those coordinated with the federal agencies, identified in the Appendix.
10. Starfish must operate in accordance with the power levels and parameters coordinated with federal agencies, including duty cycles.
11. 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 shall 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 changes to orbital parameters are required, Starfish shall 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.
12. Starfish's request for a waiver of sections 25.157 and 25.158, 47 CFR §§ 25.157, 25.158, which provide for the processing of "NGSO-like satellite systems" under a modified processing round framework and the processing of "GSO-like satellite systems" under a first-come, first-served 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 frequency band(s).¹¹ Given the opportunity for additional entrants to operate in these frequency bands, as well as 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.
13. Starfish's request for waiver of section 25.114(a)(1) of the Commission's rules, 47 CFR § 25.114(a)(1) is GRANTED. As required by the Commission's rules, Starfish has submitted with its application a completed Schedule S, which contains certain technical information in a prescribed form. However, Starfish has found that it cannot accurately describe its system in certain respects due to limitations in Schedule S itself.¹² Given that Starfish has implemented workarounds to provide the relevant information on its application, we find that a waiver of the requirement to complete certain aspects or fields of Schedule S is warranted.
14. Starfish's request for waiver of sections 25.114(c)(5) and 25.114(c)(6), 47 CFR §§ 25.114(c)(5)-(6), is DISMISSED as MOOT. Starfish has provided all the necessary information required under section 25.114 for processing of the application.
15. Starfish's request for waiver of sections 25.164 and 25.165(a) of the Commission's rules, 47 CFR §§ is GRANTED IN PART. The requirement for Starfish to post a surety bond in accordance with 47 CFR §

¹⁰ *Id.* at 6-7, 25.

¹¹ Legal Narrative at 20.

¹² *See* Legal Narrative at 17.

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16. 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 shall be for 15 years, commencing at 3 a.m. Eastern Time on the date when Starfish notifies the Commission that operation of the Otter 24A is compliant with the license terms and conditions and that the space station has been placed in its authorized orbit and begun operating.

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).

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Appendix: List of Coordinated Earth Stations

1. Paumalu, Hawaii, USA
2. Cordoba, Argentina
3. Accra, Ghana
4. Maurice, Rwanda
5. Mingenew, Australia
6. Portland, Oregon, USA
7. Dubbo, Australia