

GOOD CAUSE EXISTS FOR A WAIVER OF THE UNITED STATES TABLE OF FREQUENCY ALLOCATIONS

Denali 20020 LLC (Denali) further requests a waiver of the United States Table of Frequency Allocations ("U.S. Table") as described in section 2.106 of the rules for the frequency bands 8025 – 8400 MHz (Space-to-Earth). US258 footnotes allow for non-federal Government use of these bands in the United States on a case-by-case non-interference basis. Such use by Denali necessitates a waiver of the U.S. Table.

Good cause exists to grant Denali a limited waiver of the U.S. Table to allow proof of concept testing of the Satellogic, Nusat-7 and Nusat-8 satellites. In considering request for case-by-case spectrum uses, the Commission has indicated that it would generally grant such waivers "where there is little potential for interference into any service authorized under the Table of Frequency Allocations and when the case-by-case operator accepts any interference from authorized services." Denali seeks to operate only pursuant to special temporary authorization and thus agrees to accept any interference from authorized services. In summary, Denali's operation on a non-interference, non-protected basis support waiver of the U.S. Table for reception of frequencies 8025 - 8150 MHz only on their existing earth station Call Sign E990066 located in Brewster, Washington.