

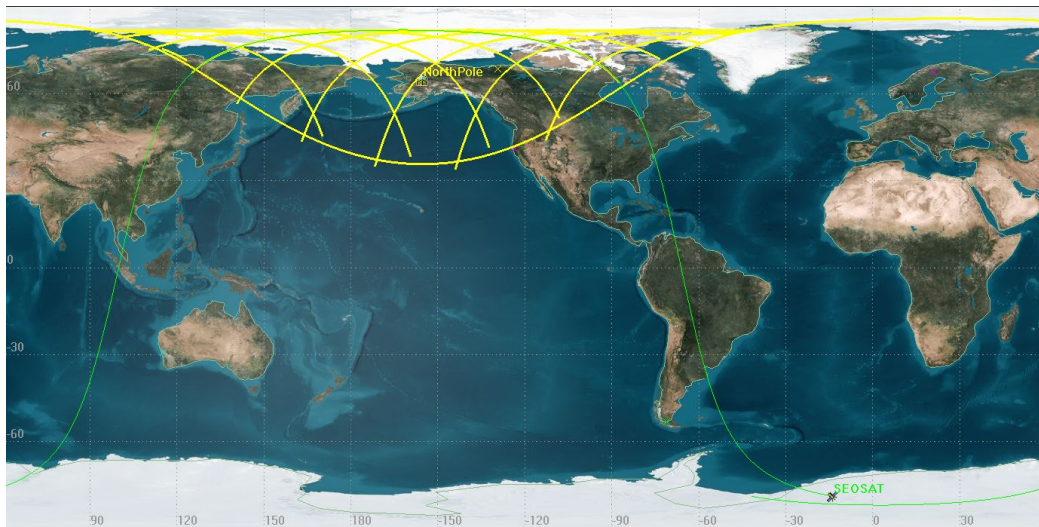
USN LEOP support for SEOSAT-Ingenio from Alaska

SEOSAT-Ingenio a first in a series of a Spanish earth observation satellite sponsored by ESA to be launch from French Guiana on 14 November 2020 at 01:52:20 UTC. This LEOP support will begin just after launch on Nov 14th and last from 4 to 7 days. The SEOSAT spacecraft will be supported by the USN Alaska ground station, which has been fully coordinated by Comsearch/Commscope.

The LEOP support is scheduled to be conducted for a minimum of 4 days, but could last up to 7 days. The first 4 days of support opportunities are shown below.

SEOSAT

```
1 90011U 00000A 20319.11580012 .00000000 00000+0 10599-1 0 00018
2 90011 98.0932 36.1026 0003559 53.4503 146.8920 14.66705684 01
```



USN Alaska coverage of SEOSAT (typical coverage each day) LEOP Nov 2020

USN Alaska possible passes for SEOSAT 14 Nov – 17 Nov 2020 UTC

Pass	Start Time (UTCG)	Stop Time (UTCG)
1	14 Nov 2020 03:01:33	14 Nov 2020 03:17:01
2	14 Nov 2020 04:50:29	14 Nov 2020 05:07:16
3	14 Nov 2020 06:41:32	14 Nov 2020 06:58:01
4	14 Nov 2020 08:35:40	14 Nov 2020 08:48:49
5	14 Nov 2020 10:35:52	14 Nov 2020 10:37:18
6	14 Nov 2020 16:17:38	14 Nov 2020 16:31:34
7	14 Nov 2020 18:08:28	14 Nov 2020 18:26:55
8	14 Nov 2020 19:59:24	14 Nov 2020 20:18:38

9	14 Nov 2020 21:50:03	14 Nov 2020 22:07:44
10	14 Nov 2020 23:39:57	14 Nov 2020 23:55:25
11	15 Nov 2020 01:28:42	15 Nov 2020 01:43:23
12	15 Nov 2020 03:16:53	15 Nov 2020 03:32:42
13	15 Nov 2020 05:06:04	15 Nov 2020 05:23:03
14	15 Nov 2020 06:57:31	15 Nov 2020 07:13:51
15	15 Nov 2020 08:52:13	15 Nov 2020 09:04:36
16	15 Nov 2020 14:43:58	15 Nov 2020 14:48:07
17	15 Nov 2020 16:33:19	15 Nov 2020 16:48:24
18	15 Nov 2020 18:24:13	15 Nov 2020 18:43:06
19	15 Nov 2020 20:15:08	15 Nov 2020 20:34:21
20	15 Nov 2020 22:05:42	15 Nov 2020 22:23:09
21	15 Nov 2020 23:55:26	16 Nov 2020 00:10:45
22	16 Nov 2020 01:44:01	16 Nov 2020 01:58:54
23	16 Nov 2020 03:32:14	16 Nov 2020 03:48:24
24	16 Nov 2020 05:21:42	16 Nov 2020 05:38:50
25	16 Nov 2020 07:13:34	16 Nov 2020 07:29:40
26	16 Nov 2020 09:08:52	16 Nov 2020 09:20:22
27	16 Nov 2020 14:58:56	16 Nov 2020 15:06:10
28	16 Nov 2020 16:49:02	16 Nov 2020 17:05:05
29	16 Nov 2020 18:39:58	16 Nov 2020 18:59:12
30	16 Nov 2020 20:30:51	16 Nov 2020 20:50:01
31	16 Nov 2020 22:21:19	16 Nov 2020 22:38:31
32	17 Nov 2020 00:10:52	17 Nov 2020 00:26:06
33	17 Nov 2020 01:59:18	17 Nov 2020 02:14:26

Flux Density impinging on the ground in Alaska from SEOSAT

The Flux density is calculated as:

$$\text{Flux density} = \text{EIRP} \div (4 \pi Rse^2)$$

Where **Rse** is the distance from spacecraft to the ground.

Where **EIRP** is the Effective Isotropic Radiated Power of the Spacecraft.

Data from the spacecraft vendor indicates that the maximum EIRP of SEOSAT is -7.93 dBW. The altitude (and thus the closest distance to earth during an overhead pass) is = 670 Km.

Converting -7.93 dBW to scalar watts = 0.161 watts transmitted at 2204.524 MHz

Therefore:

$$\text{Flux density} = 0.161 \div (4 \pi * 670,000 \text{ meters}^2)$$

Flux density = 2.855 x 10⁻¹⁴ Watts/meter²

Or

Flux density = 2.855 x 10⁻¹⁵ mW/cm²

Exhibit C
PETITION FOR WAIVER OF SECTION 25.137 AND 25.114 AND OF
THE U.S. TABLE OF FREQUENCY ALLOCATIONS

I. TO THE EXTENT THEY APPLY, GOOD CAUSE EXISTS FOR A WAIVER OF CERTAIN PORTIONS OF SECTIONS 25.137 AND 25.114

Universal Space Network, Inc. (USN) is provided limited legal and technical information for the SEOSAT Satellite.¹ Pursuant to Section 25.137 of the Federal Communications Commission's ("Commission" or "FCC") rules, the same technical information required by Section 25.114 for U.S.-licensed space station, and certain legal information, must be submitted by earth station applicants "requesting authority to operate with a non-U.S. licensed space station to serve the United States..."² USN seeks authority to support the Launch and Early Orbit (LEOP) support for the SEOSAT spacecraft to be launched in November 2020, not commercial service to the United States, and thus believes that Section 25.137 does not apply.

To the extent the Commission determines, however, that USN's request for authority to provide LEOP on a special temporary basis is a request to serve the United States with a non-U.S.-licensed satellite, USN respectfully requests a waiver of Sections 25.137 and 25.114 of the Commission's rules, to the extent that USN has not herein provided the information required by these rules.³ The Commission may grant a waiver for good cause shown.⁴ A waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In this case, good cause for a waiver of portions of Section 25.114 exists. USN seeks authority only to conduct LEOP support for SEOSAT. Thus, any information sought by Section 25.114 that is not relevant to the LEOP – e.g., antenna patterns, energy and propulsion and orbital debris - USN does not have. In addition, USN would not easily be able to obtain such information because USN is not the operator of the SEOSAT satellite, nor is USN in contractual privity with that operator. Rather, USN has contracted with Swedish Space Corporation, Solona Sweden (SSC) to support the LEOP portion in S-Band of the SEOSAT satellite.

As evidenced by the Comsearch report attached to this request, USN has coordinated the LEOP of the SEOSAT satellite with potentially affected terrestrial operators. Moreover, as with any STA, USN will conduct the test on an unprotected, non-interference basis to government operations.

¹ FCC Form 312 Section B

² 47 C.F.R. § 25.137(a)

³ 47 C.F.R. §§25.137 and 25.114

⁴ 47 C.F.R. §1.3

Because it is not relevant to the service for which USN seeks authorization, and because obtaining the information would be a hardship, USN seeks a waiver of all the technical and legal information required by Section 25.114, to the extent it is not provided herein. As noted above, USN has provided the required information to the extent that it is relevant to the LEOP service for which USN seeks authorization.

Good cause also exists to waive portions of Section 25.137, to the extent the information required is not herein provided. Section 25.137 is designed to ensure that “U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services” in other countries. Here, there is no service being provided by the satellite; USN is providing TT&C while the satellite is on the way to its low earth orbit. Thus, the purpose of the information required by Section 25.137 is not implicated here. For example, Section 25.137(d) requires earth station applicants requesting authority to operate with a non-U.S.-licensed space station that is not in orbit and operating to post a bond.⁵ The underlying purpose in having to post a bond – i.e., to prevent warehousing of orbital locations by operators seeking to serve the United States – would not be served by requiring USN to post a bond in order to conduct the 4 to 7 days LEOP support of the SEOSAT satellite.

It is USN’s understanding that SEOSAT is licensed by Spain and sponsored by ESA (European Space Agency). SEOSAT is spacecraft meant to serve the EU. Thus, the purpose of Section 25.137 – to ensure that U.S. satellite operators enjoy “effective competitive opportunities” to serve foreign markets and to prevent warehousing of orbital locations service the United States – will not be undermined by grant of this waiver request.

Finally, USN notes that it expects to communicate with the SEOSAT satellite using its U.S. earth station for a period of up to 7 days. Requiring USN to obtain technical and legal information from an unrelated party, where there is no risk of interference and the operation will cease within 7 days after launch would pose undue hardship without serving underlying policy objectives. Given these particular facts, the waiver sought herein is appropriate.

⁵ 47 C.F.R. §25.137(d)(4)

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

USN 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 2025 – 2110 MHz (Earth-to-Space) and 2200 – 2290 MHz (Space-to-Earth).⁶ Section 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 USN necessitates a waiver of the U.S. Table.

Good cause exists to grant USN a limited waiver of the U.S. Table to allow LEOP support of the SEOSAT satellite. 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."⁷ USN will coordinate with other parties operating communication systems in compliance with the Table of Frequency Allocations to ensure that no harmful interference is caused. USN seeks to operate only pursuant to special temporary authorization and thus agrees to accept any interference from authorized services. In summary, USN's operation on a non-interference, non-protected basis support waiver of the U.S. Table.

⁶ 47 C.F.R. §2.106

⁷ Previously approved STA's for Universal Space Network SES-STA-20020725-01174; SES-STA-20021112-02008; SES-STA-20040315-00475