

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of )
Planet Labs PBC ) ICFS File Nos.:
Application for Modification of License ) SAT-LOA-20220920-00112
) SAT-AMD-20231013-00251
)
) Call Sign: S3152
)

ORDER

Adopted: May 10, 2024

Released: May 10, 2024

By the Chief, Satellite Programs and Policy Division, Space Bureau:

I. INTRODUCTION

1. In this Order, we address the request of Space Exploration Technologies Corp. (SpaceX), filed in an ex parte letter, that the Commission impose certain conditions on a license for deployment and operations of a new satellite system requested by Planet Labs PBC (Planet Labs).1 We grant in part SpaceX’s request that we impose conditions on this license, but deny that request insofar as it involves conditions that are not germane to the facts presented in this case.2 The grant of Planet Lab’s request to deploy and operate satellite, as part of what it refers to as the “Tanager” system, is contained in the attached grant stamp and includes relevant license conditions.

II. BACKGROUND

2. On January 17, 2023, SpaceX filed a letter requesting that certain conditions that have been imposed on SpaceX’s license to construct, deploy, and operate up to 7,500 satellites in its Second Generation (Gen2) constellation also be imposed on several pending non-geostationary satellite applications and petitions, including the instant Planet Labs application.3 In support of its request,

1 The application was placed on Public Notice as accepted for filing on February 3, 2023. See Satellite Licensing Division and Satellite Programs and Policy Division,, Applications Accepted for Filing, Public Notice, DA 23-52 , Report No. SAT-01697 (ICFS File No. SAT-LOA-20220920-00112). See also See Policy Branch Information, Applications Accepted for Filing, Public Notice, Report No. SAT-01767 (ICFS File No. SAT-AMD-20231013-00251)(Oct. 20, 2023). On January 17, 2023, Space Exploration Technologies Corp. (SpaceX) filed an ex parte letter. Letter from David Goldman, Director of Satellite Policy, SpaceX, to Marlene H. Dortch, Secretary, FCC at 1 (dated Jan. 17, 2023) (SpaceX Letter). These issues are fully addressed in the accompanying Order.

2 For additional discussion of the deferred portion of the request, see attached grant stamp.

SpaceX cites concerns raised by the National Aeronautics and Space Administration (NASA) and the National Science Foundation (NSF) in its own licensing proceeding, as well as “space sustainability requirements” from its 7,500 satellite license. SpaceX argues, among other things, that concerns expressed by NASA in connection with the Commission’s orbital debris proceeding suggest that any constellation of 25 or more satellites should be subject to additional debris mitigation requirements.<sup>4</sup> Planet Labs filed a responsive *ex parte* letter on February 16, 2023,<sup>5</sup> and SpaceX filed a further consolidated response directed to several of the NGSO applicants on March 31, 2023.<sup>6</sup>

### III. DISCUSSION

3. We conclude that some adoption of conditions analogous to the conditions specified in the SpaceX grant, but suited for the specific and distinct factual scenario presented by the Planet Labs Tanager satellites is appropriate in this instance and in the public interest. The Tanager satellites will be deployed to orbits with a maximum altitude of 550 km, will undergo commissioning, and will subsequently be lowered using propulsion to operational altitudes between 402 km and 435 km.<sup>7</sup> At the end of the satellites’ operational lifetime, Planet Labs plans to utilize remaining capability of the propulsion system to accelerate the rate of deorbit,<sup>8</sup> but in any case the satellites would deorbit naturally within two years from the operational orbit.<sup>9</sup> With respect to the International Space Station (ISS), which operates in the vicinity of Planet Labs’ planned Tanager operational altitudes, Planet Labs specifies that it has routinely worked with relevant ISS parties to assess and manage close approaches for many years and will also do so for Tanager flight operations.<sup>10</sup> Based on this plan, we expect that the Planet Tanager satellites will be capable of being maneuvered using the propulsion system until the satellites are close to or below 350 km altitude. At this point we expect that the satellites would decay from orbit in a relatively short amount of time. In considering SpaceX’s first generation satellite system we defined a disposal failure as any case in which control of a satellite is lost at an altitude of 350 kilometers or greater.<sup>11</sup>

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<sup>3</sup> See SpaceX Letter at 1; see also *Space Exploration Holdings, LLC, Request for Orbital Deployment and Operating Authority for the SpaceX Gen2 NGSO Satellite System*, Order and Authorization, FCC 22-91 (2022) (SpaceX Gen2 Order). The SpaceX Letter requests that the FCC impose the following license conditions: (1) file semi-annual reports on collision avoidance maneuvers and satellite disposal, including any difficulties or failures related thereto; (2) apply an object-years metric for assessing disposal failures that accounts for both the number of failed satellites and their entire passive decay time; (3) communicate and collaborate with NASA to promote space safety and sustainability; (4) take all possible steps to assess and mitigate collision risk after receiving a conjunction warning from the 19th Space Defense Squadron or other source; and (5) coordinate with NSF to reach a mutually acceptable agreement to mitigate the impact of its satellites on optical ground-based astronomy, with associated annual reporting requirements). *Id.*

<sup>4</sup> SpaceX Letter at 2.

<sup>5</sup> See Letter from Danielle Piñeres, Vice President of Regulatory Affairs & Compliance, Planet Labs PBC, to Marlene H. Dortch, Secretary, FCC (filed Feb. 16, 2023) (Planet Response Letter).

<sup>6</sup> See Letter from David Goldman, Senior Director of Satellite Policy, to Marlene H. Dortch, Secretary, FCC at 2 (filed Mar. 31, 2023) (SpaceX Omnibus Response).

<sup>7</sup> Planet Labs PBC, ICFS File No. SAT-LOA-20220920-00112, Exh. D – ODAR at 3; Planet Labs PBC, ICFS File No. SAT-AMD-20231013-00251, Exh. B – Technical Appendix at 1.

<sup>8</sup> Planet Labs PBC, ICFS File No. SAT-LOA-20220920-00112, Exh. D - ODAR at 13.

<sup>9</sup> Planet Labs PBC, ICFS File No. SAT-AMD-20231013-00251, Narrative at 3.

<sup>10</sup> Planet Labs PBC, ICFS File No. SAT-LOA-20220920-00112, Narrative at 7-8.

Under the circumstances, we adopt a condition that Planet Labs report any loss of control of Planet Labs Tanager satellites at altitudes above 350 km, where it would normally expect that its satellites would have the capability to maneuver using propulsion.<sup>12</sup> Based on the information reported, the license may be subject to additional terms and conditions, including additional reporting obligations, limitations on additional deployments, requirements for early removal of satellites from orbit, or any other appropriate conditions to limit collision risk.<sup>13</sup> Inclusion of a 100 post-failure object years metric in this instance, as with SpaceX's Second Generation grant, identifies a relevant metric where additional Commission action would be necessary before deployment of additional Planet Tanager satellite following a certain level of failure.

4. We also condition Planet Labs to provide information regarding potential conjunction events during the reporting period for its satellites, particularly with respect to any difficulties encountered in the collision avoidance process. We believe that such information can help identify potential issues in operator-to-operator coordination.

5. There have been no concerns raised in this proceeding by NASA, NSF, or any other party except SpaceX regarding the instant application. While Planet Labs has indicated that it coordinates with NASA,<sup>14</sup> we are including conditions requiring continued coordination with NASA, including operator-to-operator coordination of physical operations.<sup>15</sup> Additionally, we condition this grant to require Planet Labs to coordinate with NSF as well.<sup>16</sup> We conclude that it is in the public interest for Planet Labs to bear the responsibility of ensuring that these coordinations, which are separate from coordination of spectrum use, have been completed with these potentially interested federal agencies.

#### IV. ORDERING CLAUSES

6. Accordingly, IT IS ORDERED that the Planet Labs PBC request for license is GRANTED-IN-PART and DEFERRED-IN-PART,<sup>17</sup> pursuant to section 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. § 303(r), and sections 0.51 and 0.261 of the Federal Communication Commission's rules, 47 CFR §§ 0.51 and 0.261).

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<sup>11</sup> As the Commission observed in its authorization of the SpaceX Gen2 system, "SpaceX's practice of testing its satellites at injection altitude, before orbit-raising, allows it to deorbit any non-functional satellites in a matter of days or weeks, helping to ensure that non-maneuverable satellites do not reach operational orbit." *Request for Orbital Deployment and Operating Authority for SpaceX Gen2 NGSO Satellite System*, Order and Authorization, FCC 22-91, at 91 (Nov. 29, 2022).

<sup>12</sup> See attached grant stamp at condition 19.

<sup>13</sup> There are potentially material differences between the Planet Labs constellation and the Starlink constellation that may warrant differing treatment of the two constellations. These include smaller satellite size, and consequent lower collision risk when comparing non-maneuverable satellites and a smaller number of satellites. There is also no indication that the Planet Tanager satellites will be "checked out" at lower altitudes, so immediate identification of any issues with effective maneuverability, rather than periodic reporting, is warranted.

<sup>14</sup> See Planet Labs PBC, ICFS File No. SAT-LOA-20220920-00112, Narrative at 7-8.

<sup>15</sup> See condition 20 in the attached grant stamp.

<sup>16</sup> See condition 21 in the attached grant stamp.

<sup>17</sup> See conditions in the attached grant stamp.

7. IT IS FURTHER ORDERED that petitions for reconsideration under section 1.106 or applications for review under section 1.115 of the Commission's Rules, 47 CFR §§ 1.106 and 1.115, may be filed within 30 days of the date of the public notice of this action taken.


FEDERAL COMMUNICATIONS COMMISSION

Merissa L. Velez  
Chief, Satellite Programs and Policy Division  
Space Bureau

## ATTACHMENT TO GRANT

## Planet Labs PBC

ICFS File No. SAT-LOA-20220920-00112; SAT-AMD-20231013-00251

<b>ICFS File No(s):</b>	SAT-LOA-20220920-00112; SAT-AMD-20231013-00251 <sup>18</sup>	<p style="text-align: center;"><b>G R A N T E D I N P A R T / D E F E R R E D I N P A R T With Conditions</b></p>  <p style="text-align: center;"><b>Satellite Programs and Policy Division Space Bureau</b></p>
<b>Licensee/Grantee:</b>	Planet Labs PBC	
<b>Call Sign:</b>	S3152	
<b>Satellite Name:</b>	Tanager 1 and 2	
<b>Orbital Location: (required station-keeping tolerance)</b>	NGSO at altitudes between 402 km and 435 km with orbital inclinations between approximately 96.51 and 97.59 degrees; 01:00 AM +/- 1 hour Local Time of the Ascending Node (LTAN) orbits.	
<b>Administration:</b>	United States of America	
<b>Nature of Service:</b>	Earth Exploration Satellite Service	
<b>Scope of Grant:</b>	Authority to deploy and operate two non-geostationary orbit satellites to be known as Tanager 1 and 2. <sup>19</sup>	
<b>Service Area(s):</b>	Global, subject to limitations in specific frequency bands.	
<b>Frequencies:<sup>20</sup></b>	25.5-27.0 GHz (space-to-Earth) (primary data downlink) <sup>21</sup>	
	8025-8400 MHz (space-to-Earth) (tracking and telemetry) <sup>22</sup>	
	2025-2110 MHz (Earth-to-space) (command) <sup>23</sup>	

<sup>18</sup> The application was placed on Public Notice as accepted for filing on February 3, 2023. *See Policy Branch Information, Applications Accepted for Filing*, Public Notice, DA 23-52, Report No. SAT-01697 (ICFS File No. SAT-LOA-20220920-00112). On January 17, 2023, Space Exploration Technologies Corp. (SpaceX) filed an *ex parte* letter. Letter from David Goldman, Director of Satellite Policy, SpaceX, to Marlene H. Dortch, Secretary, FCC at 1 (dated Jan. 17, 2023) (*SpaceX Letter*). The amendment was placed on Public Notice as accepted for filing on October 20, 2023. *See Satellite Licensing Division and Satellite Programs and Policy Division, Applications Accepted for Filing*, Public Notice, Report No. SAT-01767 (ICFS File No. SAT-AMD-20231013-00251).

<sup>19</sup> Planet Labs' grant is deferred-in-part with respect to the third and fourth Tanager satellites, for which Planet has stated that it will submit modified information regarding orbital debris mitigation. *See ICFS File No. SAT-AMD-20231013-00251*, Narrative at 2. The grant is also deferred-in-part with respect to inter-satellite links operating in the 4000-4200 MHz (space-to-space) and 6225-6425 MHz (space-to-space) with the third and fourth Tanager satellites. *See Letter from Danielle Piñeres, Vice President of Regulatory Affairs & Compliance, Planet Labs PBC, to Marlene H. Dortch, Secretary, FCC, at 1 (dated Jan. 19, 2024).*

<sup>20</sup> With respect to those frequency bands shared with Federal spectrum users, Federal operators have indicated that Federal missions brought into use after issuance of this grant may prevent future modification or renewal.

<sup>21</sup> With center frequencies at 25552.0 MHz, 25638.4 MHz, 25724.8 MHz, 25811.2 MHz, 25897.6 MHz, 25984.0 MHz, 26070.4 MHz, 26156.8 MHz, 26243.2 MHz, 26329.6 MHz, 26416.0 MHz, 26502.4 MHz, 26588.8 MHz, 26675.2 MHz, 26761.6 MHz, and 26848.0 MHz, each with bandwidth of 86.4 MHz.

<sup>22</sup> With center frequencies at 8030.0 MHz and 8040.0 MHz, each with bandwidth of 200 kHz.

<sup>23</sup> With center frequencies at 2056.6 MHz and 2066.6 MHz, each with bandwidth of 200 kHz; and center frequencies at 2086.1 MHz and 2096.1 MHz, each with bandwidth of 1.1 MHz.

## ATTACHMENT TO GRANT

## Planet Labs PBC

## ICFS File No. SAT-LOA-20220920-00112; SAT-AMD-20231013-00251

Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications 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. Planet Labs must prepare the necessary information, as may be required, for submission to the International Telecommunication Union (ITU) to initiate and complete the advance publication, coordination, due diligence, and notification process for these space stations, in accordance with the ITU Radio Regulations. Planet Labs shall be held responsible for all cost-recovery fees associated with ITU filings. No protection from interference caused by radio stations authorized by other administrations is guaranteed unless coordination and notification procedures are timely completed or, with respect to individual administrations, by successfully completing coordination agreements. Any radio station authorization for which coordination has not been completed may be subject to additional terms and conditions as required to effect coordination with the frequency assignments of other administrations. *See* 47 CFR § 25.111(b).
2. In connection with the provision of service in any particular country, Planet Labs is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.
3. Planet Labs is authorized to deploy two Tanager satellites. Action with respect to additional Tanager satellites is pending filing and approval by the Commission of a license modification request with an updated orbital debris mitigation demonstration which includes addressing the re-entry casualty risk associated with the deployment of future Tanager satellites.
4. Communications with the Planet Labs Tanager satellites in the 2025-2110 MHz, 8025-8400 MHz, and 25.5-27.0 GHz frequency bands may only be made to/from earth stations coordinated with the National Aeronautics and Space Administration (NASA), the Air Force Spectrum Management Office (AFSMO), DOC/NOAA, and the Department of the Navy (DON). A list of coordinated earth stations is attached in Appendix A. Planet Labs shall provide the FCC with an updated list of coordinated earth stations within ten business days following any changes to this list. Communications of the Planet Labs Tanager satellites with Federal ground stations shall be coordinated by Planet Labs' Federal government customers with AFSMO (jimmy.nguyen@us.af.mil), NASA (HQ-SatCoord@mail.nasa.gov), and DOC (edna.prado@noaa.gov).
5. Earth station transmissions to space stations in the 2025-2110 MHz band must be coordinated with the Society of Broadcast Engineers (SBE). 47 CFR § 2.106(a), (c)(346).
6. We GRANT, on our own motion, a waiver of the U.S. Table of Frequency Allocations (U.S. Table of Allocations), 47 CFR § 2.106(a), to allow non-conforming use of the 2025-2110 MHz band and the 8025-8400 MHz bands for Planet Labs' Tanager TT&C,<sup>24</sup> subject to the condition that Planet Labs operates on an unprotected and non-harmful interference basis, accepts any interference from authorized services in these bands, and complies with the other conditions below regarding operations in these bands.<sup>25</sup> Planet Labs intends to operate TT&C in these frequencies but will not operate in the EESS using these frequency bands. In the band 2025-2110 MHz, non-Federal Earth-to-space and space-to-space transmissions may be authorized in the space research and Earth exploration-satellite services. However, this does not include operations solely in the space operations service. 47 CFR § 2.106(a), (c)(347). In this instance we find good cause to waive the U.S. Table of Allocations to allow Planet Labs to operate command links only with its Tanager satellites based on Planet Labs' coordination with Federal and non-Federal users in the frequency band, which should ensure that any authorized

<sup>24</sup> Effective January 5, 2024, section 25.112(a)(3) of the Commission's rules, 47 CFR § 25.112(a)(3) is no longer applicable. *See* 88 Fed Reg. 84737. Therefore, we do not address this rule.

<sup>25</sup> *See* Condition 2.

## ATTACHMENT TO GRANT

## Planet Labs PBC

## ICFS File No. SAT-LOA-20220920-00112; SAT-AMD-20231013-00251

Federal and non-Federal users are protected from harmful interference. In the U.S. Table of Allocations, the 8025-8400 MHz band is allocated on a primary basis for non-Federal EESS (space-to-Earth), but not for space operations. 47 CFR § 2.106(a), (c)(258). Other allocations in the 8025-8400 MHz band are for Federal use only. 47 CFR § 2.106(a). Again, based on Planet Labs' coordination with federal users in the frequency band, which should ensure that any authorized federal users are protected from harmful interference, we find good cause to waive the U.S. Table of Allocations, 47 CFR § 2.106(a), to allow Planet Labs to operate telemetry and tracking with its Tanager satellites in the 8025-8400 MHz band.

7. Power flux-density limits from operation in the 8025-8400 MHz band must not exceed the limits in both 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.

8. Planet Labs must maintain for its Tanager satellites a sun-synchronous orbit with an LTAN of 01:00 AM +/- 1 hour, to not be in-phase with Federal agencies' satellite systems. In the event changes to the LTAN or other orbit parameters are required, Planet Labs must complete coordination in advance of any such changes with AFSMO, NASA, and DOC, and upon completion of coordination notify the FCC of the update within five business days.

9. Operations pursuant to this authorization must be in compliance with the terms of a Memoranda of Agreement between Planet Labs and the National Aeronautics and Space Administration (NASA) pertaining to operations in the frequency band 8025-8400 MHz.

10. In the U.S. Table of Allocations, the bands 8025-8400 MHz and 25.5-27 GHz are allocated to the Earth exploration-satellite service (space-to-Earth) on a primary basis for non-Federal use. Authorizations are subject to a case-by-case electromagnetic analysis. The 25.5-27 GHz band is also allocated to the Space Research (space-to-Earth) service on a primary basis for non-Federal use. 47 CFR § 2.106(a), (c)(258). Satellite operations in the 25.25-27.5 GHz band are limited in accordance with the coordination agreement reached between Planet Labs and U.S. Federal agencies. Additional use will require subsequent coordination and authorization from the FCC.

11. In the 8025-8400 MHz and 25.25-27.5 GHz band, power flux density must not exceed the limits in both 47 CFR § 25.208 and Table 21-4 of the ITU Radio Regulations, and the limits and guidelines in Recommendation ITU-R SA.1862 must be followed.

12. In the 25.5-27.0 GHz band, Planet Labs shall cease Tanager downlink transmission to the Svalbard, Norway earth station when the NASA PACE satellite is within a conjunction angle of 5 degrees (as measured from the boresight of the Svalbard, Norway earth station). Additionally, Planet Labs agrees to operate on a non-interfering basis to the NASA NISAR satellite operating in this same band with significant overlapping coverage area. If notified by NASA of interference into the NISAR mission, Planet Labs shall cease downlink transmissions until a mitigation strategy is coordinated, agreed, and verified by NASA.

13. Given the opportunity for additional entrants to operate in the frequency bands requested, we GRANT Planet Labs' request for waiver of the modified processing round requirements with respect to the Tanager satellites authorized in this grant. See 47 CFR §§ 25.156 and 25.157; *DigitalGlobe, Inc.*, Order and Authorization, 20 FCC Red 15696 (Sat. Div., Int'l Bur. 2005), at paragraph 8.

14. Planet Labs' request for waiver of the default service rules in section 25.217(b) of the Commission's rules is GRANTED. 47 CFR § 25.217(b). Planet Labs must comply with technical requirements in Part 25 of the Commission's rules and the above-referenced power flux-density limits, as well as other conditions which should prevent harmful interference to other operations. See *DigitalGlobe, Inc.*, *supra*, at paragraph 12.

15. Planet Labs' request for a limited waiver of section 25.114(c) of the Commission's rules, which requires certain information to be filed in the Form 312 - Schedule S is GRANTED. Specifically, Planet Labs states that several fields in the Schedule S are inapplicable and/or do not permit the entry of correct values for its system. Some of these categories (e.g., max/min saturation flux density, antenna pointing error, and antenna rotational error) are inapplicable and/or do not permit the entry of correct values. Given that Planet Labs has identified the

## ATTACHMENT TO GRANT

## Planet Labs PBC

## ICFS File No. SAT-LOA-20220920-00112; SAT-AMD-20231013-00251

relevant information for its Tanager satellites in its Technical Appendix in addition to the Schedule S, we find that waiver of the requirement to submit information in certain fields of the Form 312 - Schedule S is warranted.

16. Planet Labs must coordinate physical operations of spacecraft with any operator using similar orbits, for the purpose of eliminating collision risk and minimizing operational impacts. The orbital parameters specified in this grant are subject to change based on such coordination.

17. Upon receipt of a conjunction warning from the 18<sup>th</sup> Space Control Squadron or other source, Planet Labs must review and take all possible steps to assess the collision risk, and mitigate collision risk if necessary. As appropriate, steps to assess and mitigate should include, but are not limited to: contacting the operator of any active spacecraft involved in such warning; sharing ephemeris data and other appropriate operational information with any such operator; and modifying spacecraft attitude and/or operations.

18. This authorization is subject to modification to bring it into conformance with any rules or policies adopted by the Commission in the future. Accordingly, any investment made toward operations authorized in this grant by Planet Labs in the United States assume the risk that operations may be subject to additional conditions or requirements as a result of any future Commission actions.

19. Planet Labs must provide a semi-annual report, by January 1 and July 1 each year, covering the preceding six month period, respectively, from June 1 to November 30 and December 1 to May 31. The report should include the following: Number of conjunction events identified for Planet Labs satellites during the reporting period, and the number of events that resulted in an action (maneuver or coordination with another operator), as well as any difficulties encountered in connection with the collision avoidance process and any measures taken to address those difficulties.

Planet Labs must report any loss of control of Tanager satellites at altitudes above 350 km not later than 10 days following the loss of control.

Based on the information reported, the license may be subject to additional terms and conditions, including additional reporting obligations, limitations on additional deployments, requirements for early removal of satellites from orbit, or any other appropriate conditions to limit collision risk. In the event of Tanager satellite failures resulting in more than 100 post-failure object years, Planet Labs may not deploy any additional Tanager satellites until the Commission has approved a license modification that includes an updated orbital debris mitigation plan addressing reduction in the failure rate or mitigation of the risk of satellite failures.

20. Planet Labs must communicate and collaborate with NASA to support safety of both Planet Labs and NASA assets and to preserve long-term sustainable space-based communications services. Planet Labs must report on the progress of its communications and collaboration efforts to the Commission in its regular reports specified in condition 19, above. Planet Labs must coordinate and collaborate with NASA to promote a mutually beneficial space environment that would minimize impacts to NASA's science missions involving astronomy.

21. Planet Labs must coordinate with NSF to achieve a mutually acceptable agreement to mitigate the impact of its satellites (call sign S3152) on optical ground-based astronomy. Planet Labs must submit an annual report to the Commission, by January 1st each year covering the preceding year (1) describing whether it has reached a coordination agreement with NSF addressing optical astronomy, and (2) any steps Planet Labs has taken to reduce the impact of its satellites on optical astronomy. If Planet Labs provides a statement in the record that NSF has no concerns within 45 days following arrival of the Tanager satellites at authorized operational altitude, no further reporting will be required.

22. Planet Labs request for waiver of the Commission's bond and milestone rules, sections 25.164 and 25.165 of the Commission's rules, 47 CFR §§ 25.164, 25.165, is DENIED. Although Planet Labs plans to deploy its initial Tanager satellites within a short period following grant, we do not find that is sufficient basis to waive



## ATTACHMENT TO GRANT

## Planet Labs PBC

## ICFS File No. SAT-LOA-20220920-00112; SAT-AMD-20231013-00251

these requirements. Accordingly, grant is subject to the following requirements:

- a. Planet Labs must 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); and
- b. Planet Labs must launch 50 percent of the maximum number of proposed space stations, place them in the assigned orbits, and operate them in accordance with the station authorization no later than **May 10, 2030**, and Planet Labs must launch the remaining space stations necessary to complete its authorized service constellation, place them in their assigned orbits, and operate each of them in accordance with the authorization no later than **May 10, 2033**. 47 CFR § 25.164(b).

Failure to post and maintain a surety bond will render this grant null and void automatically, without further Commission action. Failure to meet the milestone requirements of 47 CFR § 25.164(b) may result in Planet Labs's grant being reduced to the number of satellites in use on the milestone date. Failure to comply with the milestone requirement of 47 CFR § 25.164(b) will also result in forfeiture of Planet Labs's surety bond. By **May 25, 2030**, Planet Labs must either demonstrate compliance with its milestone requirement or notify the Commission in writing that the requirement was not met.

23. Within 30 days after deployment of each satellite pursuant to this authorization, Planet Labs must file a notification with the Commission specifying its apogee and perigee altitudes and orbital inclination.

24. The license term is 15 years and will begin at 3 a.m. EST on the date that Planet Labs certifies to the Commission that its initial Tanager space station has been successfully placed into orbit and its operations fully conform to the terms and conditions of this authorization. Planet Labs must file such certification within five business days of placing its initial satellite into operation.

**ATTACHMENT TO GRANT  
Planet Labs PBC  
ICFS File No. SAT-LOA-20220920-00112; SAT-AMD-20231013-00251**

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 C.F.R. § 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).

<b>Action Date:</b>	May 10, 2024	
<b>Term Dates</b>	<b>From:</b> see conditions	<b>To:</b> see conditions
<b>Approved:</b>		
<p align="center">Merissa L. Velez Chief, Satellite Programs and Policy Division</p>		

**ATTACHMENT TO GRANT  
Planet Labs PBC  
ICFS File No. SAT-LOA-20220920-00112; SAT-AMD-20231013-00251**

**Appendix A: List of Coordinated Earth Stations**

1. Location: Svalbard, Norway
2. Location: Inuvik, Canada
3. Location: Lewisporte, Canada
4. Location: Keflavik, Iceland