

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

In the Matter of )
Kuiper Systems LLC ) ICFS File No.
Application for Extension or Waiver of the ) SAT-MOD-20260129-00065
Milestone Deadline ) Call Sign S3051/3105

ORDER

Adopted: June 5, 2026

Released: June 5, 2026

By the Chief, Space Bureau:

I. INTRODUCTION

1. In this Order, we grant, with conditions, the request of Kuiper Systems LLC (hereinafter, Amazon Leo)1 for a limited waiver of the Commission’s space station milestone deployment requirements for the Amazon Leo Gen1 Constellation (“Gen1 Authorization”).2 Amazon Leo is poised to offer cutting-edge satellite services worldwide as a new competitor-at-scale in low-Earth orbit that offers high-speed broadband to customers in unserved and underserved areas. In resolving this issue of novel complexity during a unique period when the Commission’s deployment milestone rules remain under review for fundamental change, we craft a remedy tailored to ensure that Americans quickly benefit from multiple, facilities-based providers of next-gen satellite services.

2. By waiving certain requirements associated with the Commission’s milestone rules, with conditions, we are encouraging future developments in Amazon Leo’s service and furthering American leadership in space. At the same time, the conditions imposed on this grant continue to further the goals of the Commission’s milestone rules—rapid deployment of licensed systems, efficient spectrum use, and the timely provision of service to the American people—ensuring the actions taken in this Order are in the public interest. Specifically, we impose upon Amazon Leo meaningful conditions that incent the company to continue deploying satellites at a rapid clip by temporarily demoting the spectral priority of satellites launched after the relevant July 2026 milestone deadline, until and unless Amazon Leo builds those satellites at a faster pace. We act today mindful of the specific record developed on Amazon Leo and in a way that will encourage rapid builds and launches.

1 “Amazon Leo” is formerly known as “Project Kuiper.” For the sake of consistency and clarity, we refer to both the constellation and licensee throughout this Order as “Amazon Leo.” Application of Kuiper Systems LLC for Extension or Waiver of the Milestone Deadline, Request to Extend or Waive Interim Milestone for the Amazon Leo Constellation, Kuiper Systems LLC, an Amazon subsidiary, ICFS File No. SAT-MOD-20260129-00065, Narrative at n.1 (filed Jan. 30, 2026) (Amazon Leo Milestone Modification Application); see Response of Amazon Leo, ICFS File No. SAT-MOD-20260129-00065 at 1, n. 1 (filed March 24, 2026) (Amazon Leo Response) (“Amazon Leo is the permanent brand name for Amazon’s satellite broadband network, formerly known as Project Kuiper.”).

2 Kuiper Systems LLC, Application for Authority to Deploy and Operate a Ka-band Non-Geostationary Satellite Orbit System, Order and Authorization, 35 FCC Rcd 8324 (IB 2020) (Gen1 Authorization).

## II. BACKGROUND

3. *Amazon Leo Gen1 Authorization.* In July 2020, Amazon Leo received authorization to construct, launch, and operate a non-geostationary orbit (NGSO) fixed-satellite service (FSS) constellation consisting of 3,236 satellites as part of the first Ku-/Ka-band Processing Round.<sup>3</sup> Consistent with the Commission's rules, the terms of Amazon Leo's authorization, as modified,<sup>4</sup> require deployment and operation of 50% of its authorized constellation no later than six years from the initial date of grant and 100% deployment and operation no later than nine years from the initial date of grant.<sup>5</sup> Specific to the Gen1 Authorization, Amazon Leo is required to deploy 1,616 satellites by July 30, 2026 and deploy 3,232 satellites by July 30, 2029.<sup>6</sup> In February 2026, the Space Bureau (Bureau) approved requested modifications to Amazon Leo's Gen1 Authorization, filed as an amendment to Amazon Leo's application in the 2021 V-band Processing Round, which, in part, requested to add certain V-band frequencies to the Gen1 Authorization.<sup>7</sup> The Gen1 Authorization to operate in the V-band frequencies is subject to the same milestone schedule as Amazon's Gen1 satellites authorized in the first Ku-/Ka-band Processing Round.<sup>8</sup>

4. *Space station deployment milestones and surety bond requirements.* The Commission's rules currently require NGSO space station licensees to meet specific deployment requirements, measured at interim and final milestone deployment benchmarks.<sup>9</sup> As noted above, the interim milestone requires NGSO operators to launch 50% of the maximum number of authorized space stations, place them into orbit, and operate in accordance with the terms of their authorization within six years.<sup>10</sup> Operators that successfully meet the interim milestone must then deploy the remainder of the constellation to reach 100% deployment within nine years from the date of authorization.<sup>11</sup> The Commission also requires licensees to post a surety bond, payable to the U.S. Treasury in the event of default.<sup>12</sup> If a licensee fails to meet the interim milestone, its total number of authorized satellites is reduced to the number of satellites that are in orbit and operating on the date of the missed milestone and the licensee is considered to have

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<sup>3</sup> *Id.*; see *Cut-Off Established for Additional NGSO FSS Applications or Petition for Operations in the 10.7-12.7 GHz, 12.75-13.25 GHz, 13.8-14.5 GHz, 17.7-18.6 GHz, 18.8-20.2 GHz, and 27.5-30 GHz Bands*, Public Notice, DA 20-235, 35 FCC Rcd 2881 (Mar. 24, 2020) (*First Ku-/Ka-band Processing Round*).

<sup>4</sup> The Commission granted a subsequent application for modification of the Gen1 Authorization, reducing the total number of authorized space stations from 3,236 to 3,232 satellites. See *Kuiper Systems LLC, Request for Modification of the Authorization for the Kuiper NGSO Satellite System*, Order and Authorization, 39 FCC Rcd 2180, para. 1 (SB 2024) (*Gen1 Orbital Parameters Modification*).

<sup>5</sup> Gen1 Authorization, 35 FCC Rcd at 8346, para. 67b.

<sup>6</sup> *Id.*

<sup>7</sup> *Kuiper Systems LLC*, Grant Stamp, ICFS File Nos. SAT-LOA-20211104-00145, SAT-AMD-20250311-00068, (granted Feb. 10, 2026) (*Amazon 2026 V-band Grant*) (granting in part, deferring in part, with conditions, and authorizing Gen1 system operations in the 37.5-42.0 GHz (space-to-Earth), 42.0-42.5 GHz (space-to-Earth) (outside of the U.S. and possessions only), 47.2-52.0 GHz (Earth-to-space), 50.4-51.4 GHz (Earth-to-space), and 51.4-52.4 GHz (Earth-to-space) bands); see *Cut-Off Established for Additional NGSO-Like Satellite Systems in the 37.5-40.0 GHz, 40.0-42.0 GHz, 47.2-50.2 GHz, 50.4-51.4 GHz Bands*, Public Notice, DA 21-941, 36 FCC Rcd 12148 (Aug. 4, 2021) (*2021 V-band Processing Round*).

<sup>8</sup> *Amazon 2026 V-band Grant* at Condition 12a. The Space Bureau also authorized Amazon's Gen2 system (3,212 satellites) and Polar system (1,292 satellites) with a separate milestone schedule, requiring 50% deployment no later than February 10, 2032 and 100% deployment no later than February 10, 2035. See *id.* at Conditions 12b, 12c

<sup>9</sup> 47 CFR § 25.164.

<sup>10</sup> 47 CFR § 25.164 (b)(2). *2017 NGSO Report and Order*, 32 FCC Rcd at 7830, para. 67.

<sup>11</sup> 47 CFR § 25.164(b)(2).

<sup>12</sup> 47 CFR § 25.165(a)(1).

defaulted on its surety bond obligation.<sup>13</sup> Licensees demonstrating compliance with the interim milestone requirement are relieved of the surety bond obligation.<sup>14</sup> If a licensee meets the interim milestone but fails to meet the final milestone, its authorization is similarly reduced and capped at the number of authorized satellites operating on the date of that milestone.<sup>15</sup> We evaluate Amazon Leo’s request under the Commission’s rules in place at this time, though the Commission has proposed changes to its milestone and surety bond rules.<sup>16</sup>

5. Because it is in the public interest to ensure that licensees proceed expeditiously in commencing service, the Commission has strictly enforced established milestone schedules.<sup>17</sup> The Commission’s rules permit a space station licensee to apply for a modification of its license authorization and request to extend a milestone deadline.<sup>18</sup> Any such request for extension must include a verified statement from the applicant operator, stating that: (1) the additional time is required due to unforeseen circumstances beyond the operator’s control, as described with specificity, which justifies the precise extension period requested; or (2) there are unique and overriding public interest concerns that justify an extension and that these concerns justify the precise extension requested.<sup>19</sup>

6. Generally, the Commission may waive any rule for good cause shown.<sup>20</sup> Waiver is appropriate only if both (1) special circumstances warrant a deviation from the general rule, and (2) such deviation better serves the public interest.<sup>21</sup> In making this determination, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.<sup>22</sup>

7. The Bureau evaluates requests for milestone extensions and waivers under these standards, considering the specific facts and circumstances of each request. The Bureau may weigh such requests in light of the factual scenarios cited as causing delays in deployment, progress the licensee has made toward meeting the 50% milestone, *i.e.*, whether the system is fully designed, whether deployment of its satellites has begun, and if so, how many satellites are in operation, and the planned deployment

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<sup>13</sup> 47 CFR §§ 25.161(a)(2), 25.165(c).

<sup>14</sup> 47 CFR § 25.165(d).

<sup>15</sup> 47 CFR § 25.161(a)(3).

<sup>16</sup> *Space Modernization for the 21<sup>st</sup> Century*, SB Docket No. 25-306, Notice of Proposed Rulemaking, 40 FCC Rcd 8191, 8252-59, paras. 168-83 (rel. Oct. 29, 2025) (*Modernization NPRM*).

<sup>17</sup> *Spectrum Five LLC*, Memorandum Opinion and Order, 26 FCC Rcd 10448, 10450 (IB 2011); *New ICO Satellite Services G.P.*, Memorandum Opinion and Order, 22 FCC Rcd 2229, 2233 (SD IB 2007); *NetSat 28 Co., LLC*, Memorandum Opinion and Order, 15 FCC Rcd 11321, 11323 (IB 2000).

<sup>18</sup> 47 CFR § 25.117(e).

<sup>19</sup> *Id.*

<sup>20</sup> 47 CFR § 1.3.

<sup>21</sup> *Network IP, LLC v. FCC*, 548 F.3d 116, 125-128 (D.C. Cir. 2008) (citing *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990)).

<sup>22</sup> *Northeast Cellular*, 897 F.2d at 1166 (“[A] waiver is appropriate only if special circumstances warrant a deviation from the general rule and such deviation will serve the public interest. The agency must explain why deviation better serves the public interest and articulate the nature of the special circumstances to prevent discriminatory application and to put future parties on notice as to its operation”); *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969) (“The agency’s discretion to proceed in difficult areas through general rules is intimately linked to the existence of a safety valve procedure for consideration of an application for exemption based on special circumstances.”).

schedule for undeployed satellites.<sup>23</sup> In addition, the Bureau may consider other factors in making its determinations, including any investments or expenditures in the authorized system, the length of the requested extension, and the likelihood that the licensee will meet the final milestone to launch the entire constellation.<sup>24</sup> Regarding requests for extension, the Bureau must consider whether delays were due to unforeseeable circumstances and out of the operator's control, or if the circumstances present unique and overriding public interest concerns, to justify the specific extension requested. In any case, we expect licensees to consider alternative solutions and attempt to resolve any issues that may prevent compliance with milestone obligations and demonstrate the steps taken to mitigate delays.<sup>25</sup>

8. *Amazon Leo Application for Extension or Waiver.* On January 30, 2026, Amazon Leo filed an application requesting to modify its Gen1 Authorization, seeking to extend the 50% milestone deployment deadline by 24 months, or in the alternative, requesting a waiver of this interim milestone requirement.<sup>26</sup> At the time of filing, Amazon Leo reported that it had launched 180 satellites<sup>27</sup> and estimated that it will have deployed approximately 700 satellites by July 30, 2026.<sup>28</sup> Amazon Leo requests an extension of the section 25.164(b)(1) requirement to launch at least 50% of its authorized satellites, or 1,616 Gen1 satellites, by July 30, 2028, or alternatively, requests that the Commission waive section 25.164(b)(1) to retain authorization to launch and operate any undeployed satellites by the July 30, 2026 milestone date.<sup>29</sup> Amazon Leo states that it plans to meet the 100% deployment milestone by the July 30, 2029 deadline.<sup>30</sup> To support its ability to meet an extended 50% milestone, as well as the final milestone in 2029, Amazon Leo provides detailed schedules of future launches along with information on its financial and operational investments in the Gen1 constellation and its mitigation efforts thus far.<sup>31</sup>

9. Amazon Leo cites several factors contributing to the delays in deployment in support of its requests. First, Amazon Leo argues that launch provider delays and shortages of launch availability have caused significant backlogs and extended its planned deployment timelines.<sup>32</sup> Amazon Leo cites that many of its planned launches were further delayed due to a variety of factors that were outside of its control, including weather, technical problems, prioritization of government launches, and other range and launch issues.<sup>33</sup> Additionally, Amazon Leo states that these launch delays consequently pushed back deployment of its prototype satellites, which was a critical step in designing its satellites prior to

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<sup>23</sup> See e.g., *Space Norway AS*, Order and Declaratory Ruling, 38 FCC Rcd 9244 (SB 2023) (extending the milestone and bond requirement date by one year finding that the COVID-19 pandemic was an unforeseeable circumstance causing delays); *DIRECTV Enterprises, LLC*, Order, 30 FCC Rcd 4796 (Sat. Div., IB 2015).

<sup>24</sup> See e.g., *Hughes Network System LLC*, Order, 38 FCC Rcd 1731 (IB 2023).

<sup>25</sup> See e.g., *ViaSat, Inc.*, Order, 37 FCC Rcd 13054, 13056 (IB 2022); *WB Holdings 1 LLC*, Memorandum Opinion and Order, 20 FCC Rcd 10846, 10848 (Sat. Div., IB 2005) and *Constellation Communications Holdings, Inc.*, Memorandum Opinion and Order, 18 FCC Rcd 18822, 18829 (2003).

<sup>26</sup> See Amazon Leo Modification Application at 21.

<sup>27</sup> *Id.* at 10.

<sup>28</sup> *Id.* at 11. Amazon Leo's projected deployment of 700 satellites by July 30, 2026 is approximately 21% of the total number of authorized space stations under the Gen1 Authorization.

<sup>29</sup> *Id.*

<sup>30</sup> *Id.* at 11, 18.

<sup>31</sup> *Id.* at 6-7.

<sup>32</sup> *Id.* at 7-8.

<sup>33</sup> *Id.* at 8.

manufacturing at scale.<sup>34</sup> Amazon Leo argues that these delays were unforeseeable, and that the scope of Amazon Leo's investments and progression thus far demonstrate an overall commitment to deploying its system, amounting to unique and overriding public interest concerns that justify the requested extension.<sup>35</sup> Alternatively, Amazon Leo argues that these delays warrant deviation from the interim milestone requirement, and considering its efforts to mitigate delays and its commitment to meeting its final milestone, granting the requested waiver is both in the public interest and would better serve the purpose of the milestone rule than would strict enforcement.<sup>36</sup>

10. A number of parties filed comments in response to Amazon Leo's application, many of which support granting either the requested extension or waiver.<sup>37</sup> SpaceX filed comments in opposition.<sup>38</sup> Although SpaceX does not oppose allowing Amazon Leo to continue deploying past its interim milestone date, it instead proposes deferring the undeployed portion of the Gen1 system to a new processing round.<sup>39</sup> Amazon Leo filed a response to comments and opposition on the record.<sup>40</sup>

### III. DISCUSSION

11. We grant Amazon Leo's request for waiver, in part. Amazon Leo has represented that it will fail to meet the 50% milestone required in section 25.164(b)(1) of the Commission's rules.<sup>41</sup> Upon review, the Bureau determines that Amazon Leo has demonstrated good cause to support a limited waiver of certain milestone requirements. We therefore waive the provision of section 25.161(a)(2) which caps

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<sup>34</sup> *Id.* at 9-10.

<sup>35</sup> *Id.* at 13-16.

<sup>36</sup> *Id.* at 17-20 ("Amazon Leo's aggressive mitigation efforts – pivoting launch providers, investing hundreds of millions of dollars in dedicated launch infrastructure, paying millions beyond contract price to accelerate deployment, and scaling manufacturing capabilities to 30 satellites per week – substantially compressed what would have otherwise been far long delays").

<sup>37</sup> Comments of Computer and Communications Industry Association, ICFS File No. SAT-MOD-20260129-00065 (filed Mar. 9, 2026) (CCIA Comments); Comments of U.S. Chamber of Commerce, ICFS File No. SAT-MOD-20260129-00065 (filed Mar. 9, 2026) (Chamber Comments); Comments of ITI Space Enterprise Council, ICFS File No. SAT-MOD-20260129-00065 (filed Mar. 9, 2026) (ITI SEC Comments); Comments of Lexington Institute, ICFS File No. SAT-MOD-20260129-00065 (filed Mar. 11, 2026) (Lexington Institute Comments); Comments of Taxpayer Protection Alliance, ICFS File No. SAT-MOD-20260129-00065 (filed Mar. 24, 2026) (TPA Comments); Comments of the International Center for Law and Economics, ICFS File No. SAT-MOD-20260129-00065 (filed Mar. 9, 2026) (ICLE Comments); Reply Comments of Software & Information Industry Association, ICFS File No. SAT-MOD-20260129-00065 (filed Mar. 24, 2026) (SIIA Reply Comments). The record has remained active with multiple ex parte filings. *See e.g.*, Ex Parte Presentation of Kuiper Systems LLC, ICFS File No. SAT-MOD-20260129-00065 (filed Mar. 12, 2026) (Kuiper March 12 Ex Parte); Ex Parte Presentation of Kuiper Systems LLC, ICFS File No. SAT-MOD-20260129-00065 (filed Mar. 23, 2026) (Kuiper March 23 Ex Parte); Ex Parte Letter of Space Exploration Holdings LLC, ICFS File No. SAT-MOD-20260129-00065 (filed Mar. 25, 2026) (SpaceX March 25 Ex Parte); Comments of Tech Freedom, ICFS File NO. SAT-MOD-20260129-00065 (filed Apr. 8, 2026); Ex Parte Presentation of Space Exploration Holdings LLC, ICFS File NO. SAT-MOD-20260129-00065 (filed Apr. 20, 2026). Multiple commenters, including ICLE and TechFreedom, offer broad policy recommendations on the purpose and scope of the Commission's milestone rules. Because the *Modernization Proceeding* is already examining these issues, we do not address those broader policy recommendations in this Order.

<sup>38</sup> Comments of Space Exploration Holdings, LLC, ICFS File No. SAT-MOD-20260129-00065 (filed Mar. 9, 2026) (SpaceX Comments); Reply Comments of Space Exploration Holdings, LLC, ICFS File No. SAT-MOD-20260129-00065 (filed March 30, 2026) (SpaceX Reply Comments).

<sup>39</sup> SpaceX Comments at 21-22.

<sup>40</sup> Amazon LEO Response.

<sup>41</sup> 47 CFR § 25.164(b)(1).

an authorization at the number of space stations in orbit on the milestone date,<sup>42</sup> as well as the provision in section 25.164(b)(2) which requires a licensee satisfy its 50% milestone in order to meet the full 100% milestone.<sup>43</sup> This grant does not affect Amazon Leo's existing obligation to deploy 100% of its constellation by July 30, 2029.<sup>44</sup> We grant this limited waiver with conditions, as set forth below. We note that the Commission has proposed significant reforms to the part 25 rules, including the requirements associated with milestone obligations.<sup>45</sup> Considering the proposed changes in the ongoing Modernization Notice of Proposed Rulemaking, we emphasize that the waivers granted herein are reviewed and granted on the basis of the Commission's current part 25 rules and without prejudice to any future requests to extend or waive milestones under the Commission's rules as they may be modified in the future through pending rulemaking proceedings, including the Modernization proceeding.<sup>46</sup>

12. *Waiver of the Milestone Requirements.* We find that a limited waiver of the Commission's milestone framework better serves the public interest, providing regulatory certainty for Amazon Leo and promoting more efficient use of Commission resources. We grant a limited waiver, on the Bureau's own motion, of the automatic termination provision in section 25.161(a)(2) with respect to compliance with the interim milestone deployment requirement in section 25.164(b)(1).<sup>47</sup> Section 25.161(a)(2) of the Commission's rules states that failure to meet an applicable space station milestone will result in the termination of authority for the space stations not in orbit as of the milestone date.<sup>48</sup> Under this waiver, the Bureau will not cap Amazon Leo's authority to deploy the remaining Gen1 system satellites at the number of satellites launched and operational as of the day of its July 30, 2026 interim milestone.<sup>49</sup> We clarify that waiver of section 25.161(a)(2) is limited only to the interim milestone requirement and does not extend to Amazon Leo's compliance with the final milestone required by 25.164(b)(2). In the event Amazon Leo fails to satisfy the final milestone on July 30, 2029, this will result in reduction of the total number of Amazon Leo's authorized satellites to the total number of satellites that are operational on that date, pursuant to section 25.161(a)(2).<sup>50</sup> Accordingly, Amazon Leo's authority to launch and operate any undeployed space stations will not terminate on the date of the interim milestone.

13. Given that we retain Amazon Leo's final milestone of July 30, 2029, we also grant Amazon Leo's request for waiver of section 25.164(b)(2), limited to the rule's requirement that a licensee must meet the 50% deployment milestone required by section 25.164(b)(1) as a prerequisite to its ability to comply with the final milestone deployment obligation in section 25.164(b)(2).<sup>51</sup> In other words, failure to meet the interim milestone will not bar Amazon Leo from demonstrating compliance with its required final milestone deployment deadline on July 30, 2029. We determine there is good cause to waive this

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<sup>42</sup> 47 CFR § 25.161(a)(2).

<sup>43</sup> 47 CFR § 25.164(b)(2).

<sup>44</sup> *Id.*

<sup>45</sup> *Modernization NPRM 40 FCC Rcd 8252 at paras. 168-83.*

<sup>46</sup> *Id.*

<sup>47</sup> 47 CFR §§ 1.3, 25.161(a)(2), 25.164(b). Section 25.161(a)(2) states that a station authorization shall be automatically terminated in whole or in part without further notice to the licensee upon the failure to meet an applicable milestone specified in 25.164(b)(1) or (2), if at least one authorized space station is functional in an authorized orbit, which failure will result in the termination of authority for the space stations not in orbit as of the milestone date, but allow for technically identical replacements.

<sup>48</sup> 47 CFR §§ 1.3, 25.161(a)(2).

<sup>49</sup> As discussed below, we will, however, find that such a failure would constitute a failure to meet the interim milestone for purposes of the forfeiture of Amazon Leo's surety bond. *See infra* para. 18.

<sup>50</sup> 47 CFR §§ 25.161(a)(2), 25.164(b)(2), (f).

<sup>51</sup> 47 CFR § 25.164.

provision, considering the conditions on the milestone requirement waiver imposed in this Order and Amazon's commitment to meet its final milestone deployment benchmark required by section 25.164(b)(2).

14. We find that Amazon Leo has demonstrated special circumstances warranting deviation from the milestone rules, and that Amazon Leo's deployment progress thus far, including its significant investments in its Amazon Leo constellation, justifies deviation in service and support of the public interest. We also find that the limited waiver of the automatic termination provision will not undermine the purpose of the milestone deployment requirement. Waiver serves the public interest by promoting a second large satellite broadband constellation. At this time, only one operator, SpaceX, is providing broadband to American consumers from low-Earth orbit. Amazon Leo's service promises to be "groundbreaking," both in quality of service and affordability for consumers.<sup>52</sup> Amazon Leo has further invested significant resources into meeting its commitments, including more than \$10 billion to deploy the system along with investments in physical infrastructure and manufacturing capabilities.<sup>53</sup> In this case, strict adherence to the rules would curtail Amazon Leo's deployment of its Gen1 constellation by limiting the service it can provide to American consumers. Such would be contrary to the Commission's mandate under the Communications Act, which requires that the Commission grant licenses that serve the public interest, convenience, or necessity.<sup>54</sup> On the other hand, limited waiver of the milestone rules will permit Amazon Leo to continue deployment and thus give it the opportunity to fully build out and operate its system to increase competition and provide consumers, particularly those in unserved and underserved areas of the United States, with more options for broadband service.

15. *Waiver Conditions.* In conjunction with the grant of this limited waiver, we find it in the public interest to further condition Amazon Leo's authorization to encourage deployment of 50% of its constellation as quickly as possible. We condition Amazon Leo's Gen1 Authorization for any satellites that are not deployed and operational as of July 30, 2026 such that Amazon Leo will temporarily lose the associated processing round priority status as an earlier-round system for those satellites, as initially authorized in the 2020 Ku-/Ka-band Processing Round and in the 2021 V-band Processing Round.<sup>55</sup> Amazon Leo satellites deployed after July 30, 2026 will lose such priority status until the earlier of either: (1) the date twenty (20) months, from July 30, 2026 (March 30, 2028); or (2) the date at which Amazon Leo deploys and operates 50% of its constellation. Amazon Leo may reduce the twenty-month timeframe to fifteen (15) months (October 30, 2027) by certifying to the Commission that it has both constructed all the satellites necessary to reach its 50% milestone and has procured launches sufficient to deploy those satellites.<sup>56</sup> Upon either Amazon Leo's certification that it has deployed 50% of the Gen1 constellation or

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<sup>52</sup> Amazon Leo Milestone Modification Application, Legal Narrative at 1.

<sup>53</sup> *Id.* at 6.

<sup>54</sup> 47 U.S.C. § 307(a)

<sup>55</sup> See 47 CFR § 25.261(d). Under the Commission's spectrum sharing requirements for NGSO FSS systems authorized in a processing round, prior to commencing operation, licensees must certify completion of coordination agreements with any operational NGSO FSS system authorized in an earlier processing round, or alternatively, submit for Commission approval a compatibility showing demonstrating that it would not cause harmful interference to any system with which coordination has not been completed. Amazon Leo will not be considered an "earlier-round system" under section 25.261(d) with respect to systems authorized in future processing rounds, unless and until the conditions detailed in this Order are met.

<sup>56</sup> At its discretion, the Bureau may request demonstrations, documentation, physical inspection, or other information necessary to support such certifications, which may be filed alongside a request for confidential treatment pursuant to 47 CFR § 0.459.

after the relevant time period has elapsed, any Gen1 Authorization satellites deployed after July 30, 2026 will regain their original priority status in the respective processing rounds.<sup>57</sup>

16. We find this approach satisfies SpaceX's objections to the requested milestone extension and alternative waiver requests.<sup>58</sup> However, we disagree with SpaceX that allowing the Amazon Leo Gen1 system to retain its processing round status would result in new interference concerns for operators or deter new entrants into the market.<sup>59</sup> The Bureau's approach strikes the correct balance of enforcing the rules to encourage other operators to meet their deployment milestones while still encouraging and incentivizing deployment of valuable services to the American public and promoting American leadership in space.

17. In the interest of administrative efficiency and the temporary nature of the conditions imposed on the granted waiver, we also waive, on the Bureau's own motion, the requirement in section 25.261(d) for Amazon Leo to provide a compatibility showing, prior to commencing operations on satellites deployed after July 30, 2026, to demonstrate that operations of the temporarily reassigned satellites will not interfere with other operators authorized as part of either the 2020 Ka/Ku-band and 2021 V-band Processing Rounds.<sup>60</sup> Amazon Leo must comply with the remainder of the section 25.261 requirements, and all other relevant requirements under the Commission's rules, and either coordinate with these operators or operate on a non-interference basis with respect to these operations during the time in which the undeployed Gen1 satellites are reassigned from their original priority status in these processing rounds.

18. *Surety bond.* The Commission's milestone rules, coupled with the surety bond requirement, are meant to ensure that operators are ready, willing, and able to deploy their authorized satellites.<sup>61</sup> Amazon Leo's request to either extend or waive the interim milestone requirement did not include a request for waiver of the surety bond obligations under section 25.165 of the Commission's rules, and we

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<sup>57</sup> During this temporary reassignment period, Amazon Leo will have the same coordination status as any system the Space Bureau licensed following the 2020 Ka/Ku-band and/or 2021 V-band processing rounds. *See, e.g., Space Exploration Holdings, LLC*, Authorization and Order, DA 26-36, paras. 13-15 (SB Jan. 9, 2026); *Logos Space Services, Inc.*, Grant Stamp, Condition 8a, ICFS File Nos. SAT-LOA-20241030-00243, SAT-AMD-20250328-00084 (SB granted-in-part/deferred-in-part/denied-in-part Jan. 30, 2026). Should the Commission open a new processing round within this temporary reassignment period, Amazon Leo will be temporarily placed in that processing round until it meets one of the conditions associated with the grant of the waiver.

<sup>58</sup> *See generally* SpaceX Comments, SpaceX Reply Comments.

<sup>59</sup> SpaceX Comments at 17-19. According to SpaceX, the delayed deployments will increase interference to those operators in the 2016 Ku-/Ka-band Processing Round, in contradiction of the holding in *Teledesic*. It asserts that NGSO operators function with the expectation that the Commission will enforce milestones. If a licensee misses a milestone, the authorization is reduced or "capped" at the number of satellites in use on the milestone date. Thus, extending a milestone allows "more satellites above the cap" and "change[s] the interference environment that requires coordination." *Id.* In response, Amazon Leo argues that SpaceX's rationale does not apply in the context of extension requests; rather, *Teledesic* is precedent covering license modifications that involve technical design changes. *See* Amazon Leo Response at 3-4, 15-19. We disagree with SpaceX in this circumstance. Amazon Leo's actions have indicated an intention to deploy and therefore operators should reasonably expect and plan for the interference environment established at the start of the processing round. Amazon Leo does not request any changes to the authorized frequency bands or to the configuration of its Gen1 system that would impact the overall interference environment for other operators authorized in the 2020 Ka/Ku-band or 2021 V-band processing rounds.

<sup>60</sup> 47 CFR § 25.261(d).

<sup>61</sup> *See Comprehensive Review of Licensing and Operating Rules for Satellite Services*, IB Docket No. 12-267, Second Report and Order, 30 FCC Rcd 14713, 14741-42, para. 71 (2015) ("The Commission adopted the bond requirement to establish a market-based mechanism for ensuring that licensees are willing and able to proceed with satellite construction and to discourage warehousing of scarce resources.").

decline to waive this rule on the Bureau's own motion.<sup>62</sup> Section 25.165(c) establishes that a licensee will be considered to be in default with respect to its filed surety bond if it fails to satisfy the applicable milestone requirement in section 25.164(b)(1).<sup>63</sup> Further, the milestone waiver granted in this Order is limited to the required deployment progress necessary to comply with section 25.164(b)(2). If Amazon Leo does not meet the 50% deployment requirement by July 30, 2026, it will be in violation of its interim milestone requirement under section 25.164(b)(1). We therefore find it in the public interest to enforce this applicable penalty for failure to meet a milestone under the Commission's rules and will accordingly require Amazon Leo to forfeit its surety bond if it fails to meet the 50% milestone on July 30, 2026 under section 25.165(d).

19. *Milestone Extension Request.* Considering that we grant Amazon Leo's request for alternative relief in waiving certain provisions of the milestone requirements, we need not grant or deny the request to modify its Gen1 Authorization to extend the interim milestone deployment requirement. As detailed in the application, Amazon Leo requests an additional two years to launch the undeployed satellites needed to meet the interim milestone benchmark, and then expects to launch the remaining 1,616 satellites in time to meet the final milestone.<sup>64</sup> If the Bureau were to grant the requested extension, Amazon Leo's final deployment milestone would be one year to the date after the extended 50% milestone deadline. If Amazon Leo were to fail to meet this extended milestone, its Gen1 Authorization for any undeployed satellites would then be capped at the total number of operating satellites at that time, or by July 30, 2028. In this particular scenario, we determine that the benefits of targeting the final milestone deadline outweigh the costs and potential risks of extending the interim milestone deadline. There would also be little purpose served by Amazon Leo submitting additional filings—and the Commission reviewing and re-examining Amazon Leo's progress—twice in a one year period. The record additionally supports the request for waiver, noting the special circumstances and public interest benefits particular to Amazon Leo's situation, particularly due to the delays in launch availability which do not implicate the spectrum warehousing concerns that the milestone requirements are designed to prevent.<sup>65</sup> Because the Commission supports Amazon Leo's continued deployment and near-term service to customers, we find the public interest is better served by waiving the required compliance with the interim milestone as a prerequisite to deploying and meeting the final milestone, allowing Amazon Leo to focus its resources on deploying and operating its entire constellation by July 30, 2029. We therefore believe this waiver, as conditioned, is a better and more efficient approach than grant of the proposed extension request.

#### IV. ORDERING CLAUSES

20. IT IS ORDERED that Amazon Leo's request for waiver of the milestone deployment requirement under 47 CFR § 25.164(b)(2) is GRANTED, with conditions, to the extent discussed above.<sup>66</sup>

21. IT IS FURTHER ORDERED that waiver, on the Bureau's own motion, of the automatic termination provision under 47 CFR § 25.161(a)(2), with respect to the compliance with 47 CFR 25.164(b)(1), is GRANTED.

22. IT IS FURTHER ORDERED that as of July 30, 2026, any authorized satellites in the Gen1 Authorization that are not deployed and operational, will temporarily lose the associated priority status

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<sup>62</sup> 47 CFR § 25.165(c).

<sup>63</sup> *Id.*

<sup>64</sup> See Amazon Leo Milestone Modification Application at 11, 16-18.

<sup>65</sup> See e.g., Chamber Comments; CCIA Comments; ITI SEC Comments; TPA Comments.

<sup>66</sup> Amazon Leo must continue to comply with all conditions in its authorization, as modified. *Kuiper Systems, LLC*, Grant Stamp, ICFS File Nos. SAT-LOA-20211104-00145 and SAT-AMD-20250311-00068 (granted Feb. 10, 2026).

granted in both the 2020 Ka/Ku-band Processing Round and the 2021 V-band Processing Round and will be reassigned to a later priority status. This loss of status will last for twenty (20) months—until March 30, 2028—or until 50% of the constellation is launched and operational, whichever occurs first.

23. IT IS FURTHER ORDERED that the twenty (20) month timeframe for loss of status will be shortened to fifteen (15) months upon certification from Amazon Leo that it has constructed 50% of the satellites in its Gen1 constellation and secured sufficient launches to deploy 50% of the Gen1 constellation.

24. IT IS FURTHER ORDERED that waiver, on the Bureau's own motion, of the 47 CFR § 25.261(d) requirement to file a compatibility showing for temporarily reassigned satellites' operations with respect to operators in the 2020 Ka/Ku-band and 2021 V-band Processing Rounds, is GRANTED.

FEDERAL COMMUNICATIONS COMMISSION

Jay A. Schwarz  
Chief, Space Bureau