

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of	)	
	)	
Blue Origin, LLC	)	File No. SAT-LOA-20260120-00033
	)	
Application for Authority to Launch and	)	
Operate a Non-Geostationary Satellite Orbit	)	Call Sign: _____
System	)	
	)	

APPLICATION

Kaitlyn Mahoney
Regulatory Counsel
Blue Origin, LLC
21218 76th Ave S, Kent, WA 98032
+1-253-437-9300 x 14913

Nicole Walters
Paralegal
Blue Origin, LLC
21218 76th Ave S, Kent, WA 98032
+1-253-437-9300 x 19758

Dated: January 21, 2026

SUMMARY

Blue Origin, LLC (“Blue Origin”) seeks Federal Communications Commission (“FCC” or “Commission”) authority to deploy and operate its TeraWave satellite system, a non-geostationary satellite orbit (“NGSO”), Fixed-Satellite Service (“FSS”) system. TeraWave is designed to provide resilient, high-capacity, and flexible space-based connectivity to government and enterprises, as an alternative or complement to terrestrial and subsea fiber infrastructure. Operating in the Q/V-, E-, S-, and Ka-bands, TeraWave will deliver ultra-high-throughput between global hubs and distributed, multigigabit links.

The TeraWave system will be comprised of a total of 5,408 satellites: 5,280 in Low Earth Orbit (“LEO”) and 128 in Medium Earth Orbit (“MEO”). The LEO segment consists of three altitude shells between 520 and 540 km, while the MEO segment consists of five altitude shells between 8,000 and 24,200 km. On the ground, TeraWave will communicate through both gateway terminals and user terminals, which can be deployed anywhere in the world. The TeraWave system allows customers to either connect their user terminals point to point directly or connect to the terrestrial internet infrastructure using our network of gateway terminals.

This system is optimized for end-to-end data transfer links between users and gateways, offering multigigabit connectivity in remote and suburban areas, and an alternative to existing terrestrial and subsea networks. TeraWave is designed to offer customers enhanced network resiliency, increased capacity, and reduce risks in their connectivity infrastructure.

Grant of this application will allow Blue Origin to focus on developing and integrating the infrastructure necessary to achieve its vision of a future where millions of people are living and working in space for the benefit of Earth. By providing a robust, high-capacity global connectivity

platform, TeraWave will ensure industries, such as aviation, defense, and manufacturing, have access to continuous, high-quality connectivity. This in turn will support economic growth, scale businesses in the digital age, and improve critical infrastructure resiliency, while helping to build the space-based capabilities and industrial ecosystem necessary to sustain human activity in space long term.

TABLE OF CONTENTS

	Page
SUMMARY	i
I. BLUE ORIGIN BACKGROUND	1
II. DESCRIPTION OF THE TERAWARE SYSTEM	3
A. Space Segment	3
B. Frequency Plan.....	3
C. Ground Segment	5
III. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST	6
A. TeraWave Will Complement High-Capacity Terrestrial Infrastructure	6
B. TeraWave Will Offer Secure, High-Capacity Services to Government Users, wherever they are Located	7
C. TeraWave is a Cost-Effective and Scalable Solution	8
IV. WAIVER REQUESTS	8
A. Waiver of Processing Round Procedures 47 C.F.R. §§ 25.155(b), 25.157(c)	9
B. Waiver of Table of Allocations (2025-2110 MHz, 2200-2290 MHz).....	12
C. Waiver of Power Flux Density Limits in Ka-Band	13
D. Substantial Completion.....	14
E. Limitations of Schedule S	15
V. ITU COMPLIANCE	16
VI. MILESTONE AND BOND OBLIGATIONS	16
VII. CONCLUSION.....	16

LIST OF EXHIBITS

Exhibit A – Technical Annex
Exhibit B – Ownership Exhibit
Exhibit C – ITU Cost Recovery Letter

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APPLICATION

Blue Origin seeks authority to launch and operate a NGSO FSS network in the Q/V-, E-, S-, and Ka-bands (“TeraWave”). A completed Form 312, Schedule S, and Technical Annex are included with this application, consistent with the Commission’s rules. The TeraWave system will comprise a total of 5,408 satellites: 5,280 in LEO between 520 and 540 km and 128 in MEO between 8,000 and 24,200 km. TeraWave will offer resilient, high capacity, and flexible space-based connectivity. This system will be complemented by ground-based gateway and user terminals, enabling high-capacity infrastructure for enterprise users, no matter where they are located.

Accordingly, Blue Origin respectfully requests grant of its application.

I. BLUE ORIGIN BACKGROUND

Blue Origin envisions a future where millions of people will live and work in space with a single-minded purpose: to restore and sustain Earth. Blue Origin’s mission objective is to radically reduce the cost of access to space through reusability, harness the vast resources of space to enable

future exploration, and inspire and mobilize future generations by building the road to space so that future generations can build the future—for the benefit of Earth.

In only 25 years, Blue Origin has designed, built, launched, and reused two space launch vehicles, New Shepard and New Glenn. These vehicles are powered by Blue Origin designed and manufactured engines. Blue Origin is also developing landers in support of NASA missions to the moon, enabling the delivery of astronauts and heavy cargo and fostering a durable, permanent lunar presence. Blue Origin is also designing and building Blue Ring, an all-in-one, multi-mission, multi-orbit space mobility vehicle capable of maneuvering, hosting, and deploying payloads and infrastructure services in Earth orbits, the Moon, interplanetary, and near-Earth asteroids. Our offerings enable government, commercial, and academic customers to do more in orbit and beyond: conduct breakthrough science, deliver critical services, and extend human presence deeper into space.

Blue Origin has shown commitment to each of its programs through investment in next generation facilities and by hiring and developing the best talent to support our ambitious mission. Leveraging the experience we have gleaned through the design, development, and execution of these programs, TeraWave is a logical progression for Blue Origin. Through demonstrated dedication to customer satisfaction and technical achievement, Blue Origin is well positioned to offer advanced communications infrastructure and is committed to ensuring TeraWave's services are globally accessible, reliable, and competitive. Blue Origin's existing infrastructure and experience in space operations provide a robust foundation for deploying a dependable communications network and our engineering teams bring expertise to develop state-of-the-art satellites and ground terminals.

TeraWave is the next step for Blue Origin, our customer focus and expertise make us well-suited to develop and deploy this resilient, high-capacity, and flexible space-based data transfer system.

II. DESCRIPTION OF THE TERAWARE SYSTEM

The TeraWave system is a multi-orbit system comprised of space and ground-based assets working together to support customer communication infrastructure needs around the world. This system is designed with spectrum efficiency in mind and is capable of sharing spectrum, as required by applicable rules and regulations promulgated by the Commission.

A. Space Segment

TeraWave is a multi-orbit LEO and MEO constellation. It is comprised of 5,408 satellites; 5,280 in LEO and another 128 satellites in MEO. LEO satellites will be located between 520 and 540 km, while MEO satellites will be located between 8,000 and 24,200 km. The specifics of the orbital parameters are shown in the Technical Annex at **Table 2**.

B. Frequency Plan

The TeraWave system will operate in the frequency bands as outlined in **Table 1** below.

Table 1. Frequency Bands Used by the TeraWave System

Type of Link	Transmission Direction	Frequency Band	Frequency Ranges
User Downlink	Space-to- Earth	Q/V-band	37.5-42.0 GHz ¹
User Uplink	Earth-to-Space	Q/V-band	47.2-50.2 GHz 50.4-51.4 GHz ¹
Gateway Downlink	Space-to-Earth	E-band	71-76 GHz
Gateway Uplink	Earth-to-Space	E-band	81-86 GHz
TT&C ⁽¹⁾	Space-to-Earth	E-band	71-76 GHz
TT&C ⁽¹⁾	Earth-to-Space	E-band	81-86 GHz
TT&C ⁽¹⁾⁽²⁾	Space-to-Earth	Ka-band	18.8-19.3 GHz
TT&C ⁽¹⁾⁽²⁾	Earth-to-Space	Ka-band	28.6-29.1 GHz
TT&C ⁽²⁾	Space-to-Earth	S-band	2200-2290 MHz
TT&C ⁽²⁾	Earth-to-Space	S-band	2025-2110 MHz
(1) As described in the Technical Annex, E-band will serve as the primary, long-term telemetry, tracking and command (“TT&C”) band for LEO satellites. Ka-band will serve as contingency and launch and early orbit phase (“LEOP”) for LEO satellites. (2) As described in the Technical Annex, Ka-band will serve as the primary, long-term TT&C band for MEO satellites. S-band will serve as contingency and LEOP for MEO satellites.			

TeraWave offers an end-to-end communications link between users and gateways. Gateways link users to terrestrial internet infrastructure. User beams are in the Q/V-band and formed using direct radiating arrays. Gateway beams are in the E-band and use large, steerable antennas to handle high data needs from aggregate user traffic. TT&C within the TeraWave system will operate on separate bands depending on the segment. For the LEO segment of the

¹ Blue Origin intends to seek access to the currently unallocated 42-42.5 MHz and 51.4-52.4 MHz bands, if and once allocated for FSS use. Blue Origin will follow any subsequent rules imposed upon these bands once allocated.

constellation, the TeraWave system will nominally utilize E-band, with Ka-band serving as a backup. The MEO segment of the constellation will nominally use Ka-band, with S-band serving as a backup. The frequencies, polarization, and coding of telemetry, tracking, and command transmissions have been selected to minimize interference into other satellite networks. TeraWave will also utilize optical links in MEO to ground-based optical terminals, as well as in MEO and LEO for inter-system communications over inter-satellite links (“ISLs”), minimizing the system’s spectrum needs.²

C. Ground Segment

The Ground Segment for Blue Origin’s TeraWave system consists of Operations Centers (“OC”), gateway Earth stations, user terminals, and optical terminals. The OC will orchestrate the global connection between user end points and gateways considering spacecraft positional and traffic loading data at any given time. The OC, through separate TT&C ground stations, may also be utilized for certain system state-of-health activities such as LEOP, collision avoidance, and spacecraft off-nominal (anomaly support) contingencies.

The gateway Earth stations will include a system of parabolic antennas. These antennas will support forward and return links utilizing E-band. The user terminals will be phased array antennas deployed at customer facilities and will utilize Q/V-bands for forward and return links. The optical terminals will be used as additional capacity support for the entire TeraWave system.

² The Commission has previously found that it does not have jurisdiction over the use of optical links because they do not involve wire or radio frequency transmissions. *See, e.g., Teledesic LLC*, 14 FCC Rcd. 2261, ¶ 14 (IB 1999).

III. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST

Reliable access to high-capacity connectivity is integral to innovation, national security, and economic growth. Explosive growth in cloud migration, AI workloads, real-time collaboration, and rich media is driving historic bandwidth demand and east-west traffic between data centers and edge sites. At the same time, even brief network outages create unacceptable risks for government, defense, critical infrastructure, and enterprise users, leading to mission failure, safety concerns and financial loss. Existing networks and SLAs, built primarily around terrestrial and subsea fiber, are often not engineered to provide truly “always-on” performance in the face of these demands. Blue Origin seeks to increase access to high-capacity, resilient connectivity for governments and enterprise customers worldwide. Grant of this application will serve the public interest by expanding high-capacity broadband access, accommodating rapidly growing data demands, improving network redundancy, and enhancing national and economic security, described below.

A. TeraWave Will Complement High-Capacity Terrestrial Infrastructure

TeraWave will offer complementary connectivity solutions to terrestrial and subsea fiber infrastructure. Terrestrial and undersea fiber networks form the backbone of today’s global communications, but can be expensive and time consuming to deploy, especially in remote or geographically challenging regions. They also face limits and outages: they cannot be easily or quickly extended to many rural locations, and their physical, fixed nature makes them susceptible to damage through natural disasters, construction accidents, or malicious interference. Engineering fully diverse fiber paths with very high availability is costly and often impractical. As reliance on digital infrastructure grows, these vulnerabilities translate directly into intolerable downtime risk,

where minutes of disruption on major routes can have outsized national security and economic consequences.

TeraWave does not face the complexities of traditional fiber networks. Instead, it uses a multi-orbit, space-based architecture to deliver ultrahigh throughput connectivity between gateway Earth stations and distributed, multigigabit links for high demand, enterprise-like users. The combination of user terminals and gateway Earth stations ensures a resilient and interoperable network, providing diverse communication paths and improving real-time data sharing for users. TeraWave enables high-capacity service in remote, rural, and suburban areas where fiber deployment may be infeasible. By offering an additional layer of global connectivity TeraWave will increase route diversity, reduce single failure risks, and strengthen the overall resilience and capacity of U.S. and international data transfer networks.

B. TeraWave Will Offer Secure, High-Capacity Services to Government Users, wherever they are Located

TeraWave is developed to offer secure, high-capacity services for government users—civil, defense, and national security—wherever they operate. These users face some of the most acute consequences from connectivity loss; downtime risk is not tolerable, as loss or degradation of communications can hinder command and control, situational awareness, humanitarian response, and continuity of critical operations. By combining global coverage, high throughput, and flexible link architectures, TeraWave can deliver resilient connectivity to government facilities and operations in remote or austere locations. These capabilities will help ensure that government users retain access to secure, reliable communications even when terrestrial or subsea infrastructure is unavailable, degraded, or deliberately denied. In doing so, TeraWave will advance U.S. national and economic security interests, and therefore, the public interest.

C. TeraWave is a Cost-Effective and Scalable Solution

TeraWave is designed as a cost effective and scalable platform that can evolve with accelerating data demands. Its architecture enables predictable, high-capacity connectivity across a wide range of use cases, directly aligning with the rapid growth in bandwidth needs driven by AI, cloud computing, and other data-intensive applications. The system is flexible, capable of meeting varying bandwidth requirements allowing users to scale capacity as their missions and workloads grow. TeraWave is particularly valuable where deploying diverse, high-capacity terrestrial infrastructure would be prohibitively expensive or technically impractical, such as for remote communities, critical infrastructure operators, scientific facilities, and emerging industrial users that remain underserved by existing networks. By offering a scalable, space-based complement to terrestrial infrastructure, TeraWave broadens participation in the digital economy while reducing systemic risks associated with over-reliance on a limited set of fiber routes.

In summary, authorization of the TeraWave system will meaningfully advance the public interest by expanding high-capacity broadband access, accommodating exploding bandwidth demands, improving network redundancy, and enhancing both national and economic security.

IV. WAIVER REQUESTS

The Commission may waive any of its rules if there is “good cause” to do so.³ In general, waiver is appropriate if (1) special circumstances warrant a deviation from the general rule; and

³ See 47 C.F.R. § 1.3; *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

(2) such deviation would better serve the public interest than would strict adherence to the rule.⁴ Generally, the Commission will grant a waiver of its rules in a particular case if the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest.⁵ Blue Origin submits that good cause exists to waive the following rules.

A. Waiver of Processing Round Procedures 47 C.F.R. §§ 25.155(b), 25.157(c)

47 C.F.R. § 25.157 sets forth the procedures for conducting processing rounds to process applications for authority to launch and operate for NGSO-like systems. Under that framework, a processing round is initiated by a lead application being placed on Public Notice and establishing a cut-off date before which competing applications must file an application to be considered within the processing round under 47 C.F.R. § 25.155(b).⁶ The purpose of the processing round procedures is to establish a sharing environment among NGSO systems that prevent one applicant from precluding entry by other satellite operators in the same frequency band with a measure of certainty.⁷

In turn, the Commission has previously waived the processing round rules for NGSO systems when doing so would not preclude entry of additional operators in the same frequency

⁴ See *Northeast Cellular*, 897 F.2d at 1166.

⁵ See *WAIT Radio*, 418 F.2d at 1157.

⁶ See 47 C.F.R. § 25.157(c)(2).

⁷ See Amendment of the Commission's Space Station Licensing Rules and Policies, 18 FCC Rcd. 10760, ¶ 25 (2003); see also Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters, 32 FCC Rcd. 7829, ¶ 61 (2017).

band or cause harmful interference to existing licensees, undermining the purpose of the rule.⁸ Further, the Commission has previously declined to open processing rounds to enable NGSO FSS operations in instances in which the Commission determined that the requested operations would not create new spectrum conflicts with other operators and instead that there was efficiency in authorizing the requested operations with conditions rather than open a new processing round.⁹ Because Blue Origin's proposed use of the requested frequencies would not preclude entry of additional operators in the same frequency band or present frequency conflicts, good cause exists to waive the processing round requirements here.

As described in the Technical Annex, Blue Origin commits to coordinate with other co-frequency NGSO systems, or, in the absence of a coordination agreement, operate in such a way as to avoid harmful interference into other NGSO systems. This will be accomplished through showings of non-interference with existing, operational users.

The Commission has appropriately acknowledged the evolution in NGSO system technology when evaluating modernization of processing round rules to adequately service U.S.

⁸ See, e.g., *Iridium Constellation LLC*, 31 FCC Rcd. 8675, ¶ 41 (IB & OET 2016) (waiving processing round requirements for an NGSO system because access will not preclude additional entry); *Northrop Grumman Space & Mission Systems Corporation*, 24 FCC Rcd. 2330, ¶¶ 23-34 (IB 2009) (same); *Space Imaging, LLC*, 20 FCC Rcd. 11964, ¶ 10 (IB 2005) (same); *Lockheed Martin Corporation*, 20 FCC Rcd. 11023, ¶ 15 (IB 2005) (same).

⁹ See, e.g., *Audacy Corporation*, Application for Authority to Launch and Operate a Non-Geostationary Medium Earth Orbit Satellite System in the Fixed- and Inter-Satellite Service, Order and Authorization, 33 FCC Rcd 5554, 5562, para. 21 (2018) (Audacy Order); *The Boeing Company*, Application for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in the Fixed-Satellite Service, Order and Authorization, 36 FCC Rcd 16067, 16075-76, paras. 21-23 (2021) (Boeing Order); *Space Exploration Holdings, LLC*, Request for Orbital Deployment and Operating Authority for the SpaceX Gen2 NGSO Satellite System, Order and Authorization, 39 FCC Rcd 2159, paras. 10-13 (2024) (SpaceX Gen2 Order).

businesses in their endeavors to operate NGSO systems.¹⁰ Blue Origin’s modern NGSO system is being designed intentionally to not preclude other operators, including those participating in previous processing rounds.

Finally, the Commission should “take into account considerations of hardship, equity, or more effective implementation of overall policy,”¹¹ when determining if a waiver is appropriate. While the Commission is openly seeking feedback on a framework they acknowledge is a regulatory obstacle, it would not serve the public interest to open a processing round. To continue to rely on an antiquated system would stifle innovation and discourage U.S. businesses from submitting applications, thereby advantaging non-U.S. entities who are unburdened by this framework. This will also disadvantage current applicants against those who will benefit from the new framework or lack of processing round framework at all. Further, requiring Blue Origin to await conclusion of a processing round to launch and operate the TeraWave system would significantly delay consideration of the application and preclude realization of the significant public benefits the system will offer.

Accordingly, authorizing Blue Origin to operate within the requested frequency bands without conducting a processing round is in the public interest. Blue Origin understands that granting a waiver of a processing round would not confer higher priority among grants with similar waivers or pursuant to the next processing round. For the purposes of 47 C.F.R. § 25.261, the

¹⁰ See *Space Modernization for the 21st Century*, Notice of Proposed Rulemaking, SB Docket No. 25-306, FCC 25-69, para. 133 (rel. Oct. 29, 2025) (*Space Modernization NPRM*); see also 90 Fed. Reg. 56338 (Dec. 5, 2025).

¹¹ See *WAIT Radio*, 418 F.2d 1159.

obligation to protect earlier round systems should sunset as of the first authorization or grant of market access with respect to Blue Origin and other similarly situated systems, whether they were formally granted as part of a processing round or not.

B. Waiver of Table of Allocations (2025-2110 MHz, 2200-2290 MHz)

Blue Origin request authority to use the 2025-2110 MHz band (Earth-to-space) and 2200-2290 MHz band (space-to-Earth) for contingency and LEOP for the MEO segment of the TeraWave system. Internationally, these bands are allocated for space operations and space research services (Earth-to-space and space-to-space), *inter alia*, on a primary basis.¹² In the U.S., these bands are similarly allocated for space operations, Earth exploration satellites, and space research, though use of these bands is generally limited to Federal operators with certain exceptions for non-Federal space launch services.

Blue Origin's requested S-band operations are strictly limited in scope and duration. First, S-band is only proposed for those 128 satellites operating in MEO, not for the entire TeraWave system. Second, S-band will be employed solely for certain LEOP activities and in off-nominal or contingency situations for these MEO satellites. Under nominal operating conditions, Ka-band will serve as the primary communications path for the TeraWave system.

Blue Origin accepts that its operations will be subject to protection of authorized Federal and non-Federal space launch users operating in accordance with the Table of Frequency Allocations. Blue Origin will implement appropriate technical and operational measures so that its

¹² See 47 C.F.R. § 2.106.

use of the 2025–2110 MHz and 2200–2290 MHz bands will not cause harmful interference to, and will not claim protection from, Federal and non-Federal stations operating pursuant to the Commission’s rules and applicable U.S. allocations.

C. Waiver of Power Flux Density Limits in Ka-Band

The ITU has adopted a single set of power flux density (“PFD”) limits for NGSO systems across the entire 17.7-19.3 GHz band, which the Commission has incorporated by reference into its rules.¹³ These limits have a scaling factor based on the total number of satellites in an NGSO system, rather than to the number of satellites actually in view of terrestrial systems at any given time or to the specific operational characteristics of a given network. As applied to Blue Origin’s system, this construct is outdated and unduly restrictive, because it does not reflect actual interference scenarios and can unnecessarily constrain operations. For these reasons and the reasons stated below, Blue Origin seeks a waiver of these PFD limits as applied to its Ka-band TT&C operations.

Blue Origin’s proposed use of Ka-band is limited to TT&C functions. In the LEO segment, which comprises the largest portion of the proposed constellation, Ka-band will be employed only on a contingency basis and during LEOPs. Blue Origin proposes to use Ka-band as the primary TT&C link only for the MEO segment, comprised of only 128 satellites. This relatively small number of MEO satellites, combined with the limited operational role of Ka-band in the LEO

¹³ See 47 CFR 25.146(a)(1).

segment, substantially reduces, if not eliminates, the potential for harmful interference to terrestrial services even in the absence of strict adherence to the PFD limits.

Blue Origin will equip all satellites with frequency-flexible transmitters capable of dynamically selecting operating frequencies as needed. TT&C operations inherently require low bandwidth. When combined with Blue Origin's use of frequency agility and operational controls, these characteristics will enable Blue Origin to minimize or eliminate potential interference while still maintaining the reliability and safety-critical integrity of its TT&C links.

In light of the narrowly tailored, TT&C-only use of Ka-band; the contingency-only Ka-band operations in the LEO segment; the limited number of satellites using Ka-band as a primary TT&C link in MEO; and the use of frequency-flexible transmitters and operational interference-mitigation techniques, strict application of the current PFD limits is not necessary to protect terrestrial systems from harmful interference. Accordingly, grant of the requested waiver will serve the public interest by enabling Blue Origin to provide more robust service offerings to users while ensuring such systems are protected. Blue Origin therefore requests that the Commission waive the Ka-band PFD limits, as incorporated into Section 25.146(a)(1) of its rules to permit the proposed TT&C operations described herein.

D. Substantial Completion

Blue Origin requests waiver of Section 25.112(a) of the Commission's rules to the extent necessary. 47 C.F.R. § 25.112 provides that an application will be unacceptable for filing and will be returned to the applicant if the application lacks completeness of answers to questions or

informational showings,¹⁴ and that such an application may still be found acceptable for filing if accompanied by a waiver request.¹⁵ As discussed in the Technical Annex, the TeraWave satellite design is currently being matured, and accordingly, Blue Origin intends to revise our orbital debris mitigation plan as the system and satellite design continues to mature. Pending design maturity, Blue Origin has instead disclosed its design plans and certifications to meet Commission rules. Accordingly, the TeraWave application should be found acceptable for filing, and a waiver of 47 C.F.R. § 25.112 should be granted to the extent necessary.

E. Limitations of Schedule S

Blue Origin, to the extent necessary, requests a limited waiver of 47 C.F.R. § 25.114(c), which requires certain technical information to be provided in the Schedule S.¹⁶ It is impracticable to submit complete orbital parameter data for using the Schedule S web form. Accordingly, Blue Origin is instead providing a sample of that data in the Schedule S and will additionally provide a spreadsheet of the complete orbital information for the system. Strict application of the rules here is unnecessary to serve the purposes of the rules, which is to ensure that the Commission has all the relevant information to evaluate the application. Because Blue Origin has provided all relevant information in the Technical Annex, waiver of these Schedule S requirements is appropriate.

¹⁴ 47 C.F.R. § 25.112(a)(1).

¹⁵ 47 C.F.R. § 25.112(b)(1).

¹⁶ 47 C.F.R. § 25.114(c).

V. ITU COMPLIANCE

Blue Origin has prepared the ITU Advance Publication Information and Coordination Request submission for its proposed system and is contemporaneously providing this information to the Commission under separate cover. Also submitted contemporaneously with the application is Blue Origin's signed ITU cost-recovery letter.

VI. MILESTONE AND BOND OBLIGATIONS

Blue Origin will comply with satellite launch milestones as applied to authorized NGSO satellite systems pursuant to 47 C.F.R. § 25.164(b). Additionally, Blue Origin will comply with the bond obligations for authorized NGSO systems pursuant to 47 C.F.R. § 25.165.

VII. CONCLUSION

For the reasons stated above, Blue Origin submits that the public interest would be served by grant of this application.

Respectfully submitted,

/s/ []

Kaitlyn Mahoney
Regulatory Counsel
Blue Origin, LLC
21218 76th Ave S, Kent, WA 98032
+1-253-437-9300 x 14913

Nicole Walters
Paralegal
Blue Origin, LLC
21218 76th Ave S, Kent, WA 98032
+1-253-437-9300 x 19758

Dated: January 21, 2026