

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	)	File No. SAT-MOD-20260720-00299
	)	
Planet Labs PBC	)	Call Sign S2912
	)	
Application for Modification of License	)	

MODIFICATION APPLICATION

Planet Labs PBC (“Planet”) hereby requests authority from the Federal Communications Commission (“Commission”), under 47 C.F.R. § 25.117, to modify Planet’s Pelican satellite license (Call Sign S2912)¹ to authorize the launch of a single Pelican V1 satellite to an insertion altitude of up to 610 km in Q4 2026.

Planet requests this modification of its Pelican license to enable deployment of a single Pelican V1 satellite to an insertion altitude of up to 610 km because launch options from Planet’s rideshare provider are now frequently dropping off at altitudes up to 610 km. Planet therefore seeks flexibility to enable one V1 Pelican to insert at this higher altitude in order to enable a wider range of launch options for this satellite as soon as Q4 2026. Grant of this modification will enable Planet to launch this V1 satellite more quickly and thereby to provide imagery quality improvements and timely service offerings to its customers. Note that the remaining V1 Pelicans have already been launched to lower orbits consistent with Planet’s existing license,² resulting in a need for this modification only with respect to a single V1 Pelican. This

¹ See SAT-MOD-20251117-00319; SAT-AMD-20251219-00391 (granted Apr. 7, 2026).

² Please see the previous launch notices for the V1 Pelican satellites filed in ICFS File No. SAT-MOD-20220421-00042 on the following dates: May 11, 2026 (supplemented July 15, 2026), Dec. 5, 2025, Sept. 12, 2025, Jan. 30, 2025, Dec. 7, 2023).

modification relates solely to the initial insertion orbit. This V1 Pelican spacecraft will still operate in its authorized operational orbit of 440 km +/- 25 km, and there are no changes to the spacecraft's operational radio frequency parameters, operational physical characteristics, or its post-mission disposal plan.

An updated ownership exhibit is attached as Exhibit A. An updated Pelican V1 ODAR that accounts for an insertion orbit up to 610 km is attached as Exhibit B. The ODAR demonstrates that the Pelican V1 design remains compliant with the Commission's orbital debris rules, even when inserting at this higher altitude. Note that Planet previously provided an edge case radiofrequency interference analysis for 610 km with its modification and amendment associated with the V2 Pelican spacecraft.³ Because the radio design for the V1 and V2 Pelican spacecraft is identical in all material respects, this previously presented analysis also serves as demonstration that inserting this V1 spacecraft up to 610 km will comply with the relevant power flux density limits

For the reasons set forth above, Planet respectfully requests expeditious grant of the satellite license modification application.

Respectfully submitted,

/s/ Danielle J. Piñeres

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³ See SAT-MOD-20251117-00319; SAT-AMD-20251219-00391, at Amendment Narrative at 2-3 (granted Apr. 7, 2026).