

GRANT
Planet Labs PBC
SAT-MOD-20260720-00299

 GRANTED* Space Bureau	File # SAT-MOD-20260720-00299 Call Sign: <u>S2912</u> Grant Date: <u>08/14/2026</u> (or other identifier) From: <u>August 14, 2026</u> To: <u>February 28, 2029</u> Approved: <u>Carolyn A. Mahoney</u> Acting Division Chief Satellite Programs and Policy Division
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*with conditions

ICFS File No(s):	SAT-MOD-20260720-00299 ¹	GRANTED With Conditions  Satellite Programs and Policy Division Space Bureau
Licensee/Grantee:	Planet Labs PBC (Planet)	
Call Sign:	S2912	
Satellite Name:	Flock/SkySat/Pelican constellations	
Orbital Location: (required station-keeping tolerance)	Flock: Non-geostationary satellite orbit (NGSO) at altitudes between 350 km and 720 km. SkySat: NGSO with SkySat 1 and 2 at altitudes between 450-637 km and inclinations between 85 and 100 degrees, SkySat 3-15 at altitudes below 630 km and inclination between 97.0 and 97.9 degrees, SkySat 16-18 at altitudes below approximately 450 km and inclination of 53.0 degrees, SkySat 19 at altitudes below approximately 425 km and inclination of 53.0 degrees, SkySat 20-21 at altitudes below approximately 420 km and inclination of 53.0 degrees,² SkySat 3-21 at altitudes 400 km and 630 km and inclinations between 97.0 and 97.9 degrees, and SkySat 16-21 alternative orbit approximately 400 km to 420 km and inclinations between 40.0 and 60.0 degrees. 1 Pelican V1 satellite: NGSO, deployed to and commissioning at altitudes between 250 km and 550 km, with operations in sun-synchronous orbit (SSO) at altitude of 325 km (± 25 km), and inclination of 96.7 degrees;³ 7 Pelican V1 satellites:⁴ NGSO, deployed to and commissioning at 535 km, with operations at altitude of 440 km (± 25 km) in either SSO or 53 degrees (± 2 degrees);⁵ 14 Pelican V1 or V2 satellites: NGSO, deployed to and commissioning at 325 km (± 25 km), and inclination of 53 degrees;⁶ or for Pelican V2 satellites: operational altitude of 350 km (± 25 km) in either SSO or 45-55	

¹ Planet Labs PBC, Application for Modification of License, File No. SAT-MOD-20260720-00299 (filed July 20, 2026) (Application).

² Planet states that the SkySat satellite orbits will not be perfectly circular. See ICFS File No. SAT-MOD-20230224-00040, Ex. B at 3, n.10. However, the orbital altitudes will be within the ranges specified.

³ See *Planet Labs PBC*, Grant, ICFS File Nos. SAT-MOD-20231031-00269, SAT-AMD-20250130-00033, SAT-AMD-20231127-00290, SAT-MOD-20220421-00042, SAT-MOD-20240723-00157, SAT-MOD-20231031-00269 (granted-in-part, deferred-inpart Jan. 30, 2026) (*Planet Jan. 2026 Grant*).

⁴ See Application, Narrative at 1.

⁵ See ICFS File No. SAT-MOD-20250527-00129.

⁶ See ICFS File No. SAT-MOD-20220421-00042, Application, Tech Appendix at 1.

GRANT
Planet Labs PBC
SAT-MOD-20260720-00299

	degree inclined orbits with up to six Pelican V2 satellites deployed to and commissioning up to 610 km. 1 Pelican V1 deployed to and commissioning up to 610 km for initial insertion altitude, with operations at altitude of 440 km (± 25 km) in either SSO or 53 degrees (± 2 degrees). ⁷	
Administration:	United States of America	
Nature of Service:	Earth Exploration Satellite Service (EESS)	
Scope of Grant:	Modification of Planet's license to authorize deployment of a single Pelican V1 satellite at an insertion altitude of up to 610 km.	
Previous Grant(s):	Authority to construct, deploy, and operate a constellation of up to 544 technically identical non-geostationary satellites as follows:⁸ • 12 Flock 2p satellites deployed at 505 km with an inclination of 97.51 degrees by the PSLV launch vehicle; • 529 Flock satellites initially deployed to orbital apogee altitudes of no greater than 660 kilometers, including up to 3 satellites with an Automatic Identification System (AIS) receiver system to demonstrate the capability of the satellites receive AIS 1 (161.9625 MHz-161.9875 MHz) and AIS 2 (162.0125-162.0375 MHz) channels; • 3 satellites for purposes of a propulsion demonstration, deployed to orbital apogee altitudes of approximately 550 kilometers. Authority to allow no more than 120 Flock satellites to be deployed to orbits that exceed an apogee altitude of 550 kilometers, rather than 500 kilometers.⁹ Authority to construct, deploy, and operate two satellites, SkySat-1 and SkySat-2, in high-inclination circular orbits.¹⁰ Authority to construct, deploy, and operate SkySat-3.¹¹	

⁷ See Application, Narrative at 1-2, ODAR at 5.

⁸ See ICFS File Nos. SAT-MOD-20170713-00103 (granted-in-part, deferred-in-part May 24, 2018); SAT-AMD-20171106-00151 (granted May 24, 2018); SAT-AMD-20171025-00144 (granted Dec. 8, 2017); SAT-MOD-20150802-00053 (granted-in-part, deferred-in-part Sept. 15, 2016; granted-in-part, deferred-in-part Dec. 8, 2017); SAT-MOD-20140912-00100 (granted Oct. 23, 2014); SAT-MOD-20140321-00032 (granted June 18, 2014); SAT-LOA-20130626-00087 (granted Dec. 3, 2013); SAT-MOD-20170713-00103 (granted Jul. 19, 2018).

⁹ See ICFS File No. SAT-MOD-20170713-00103 (granted in part, deferred in part May 24, 2018) (noting also that the total number of simultaneously operational satellites refers specifically to those satellites providing EESS and does not include non-operational satellites that continue to operate in TT&C frequency bands as part of approved post-mission disposal plans).

¹⁰ See ICFS File No. SAT-LOA-20120322-00058 (granted Sept. 20, 2012).

¹¹ See ICFS File No. SAT-MOD-20150408-00019 (granted-in-part, deferred-in-part June 10, 2016).

GRANT
Planet Labs PBC
SAT-MOD-20260720-00299

	Authority to construct, deploy, and operate 12 additional satellites, SkySat-4 through SkySat-15, in circular orbits with altitudes from 400 to 630 km, depending on the launch vehicle used, and with inclination ranging between 97 and 97.9 degrees.¹² Authorization to deploy and operate up to six additional non-geostationary orbit remote-sensing satellites, SkySat-16 through SkySat-21, in circular orbits with altitudes from 400 to 630 km, depending on the launch vehicle used, and with inclination ranging between 97 and 97.9 degrees.¹³ Modification of the specified operational orbital altitude range for SkySat-16 and SkySat-21 satellites to include the inclination range of 40.0 to 60.0 degrees in addition to the inclination range of 97.0 degrees and 97.9 degrees. Modification of the specified operational orbital range for SkySat-3 to include altitudes down to 400 km.¹⁴ Consolidation of the SkySat satellites (Call Sign S2862) and the Flock satellites (Call Sign S2912) under one call sign (Call Sign S2912).¹⁵ Authority to deploy and operate up to 7 technically-identical NGSO satellites to be known as the Pelican satellites.¹⁶ Modification of C-band intersatellite link operations for the Pelican-2,¹⁷ Pelican-3 and Pelican-4¹⁸ and Pelican-5 and Pelican-6¹⁹ satellites to: (1) reflect an increase in the number of low-gain C-band receive antennas from one to three; (2) revise the bandwidth for its C-band receive signals in the 4000-4200 MHz band from 2 megahertz to a range of 1-10 megahertz and the bandwidth for the C-band transmit signals in the 6225-6425 MHz band from 2 megahertz to a range of 1-10 megahertz; (3) reflect the replacement of the low-gain C-band omnidirectional transmit antenna with a higher gain transmit antenna; and (4) update receive and transmit bandwidths to be in the 4000 MHz – 4200 MHz range, with only one operational at any time. Modification of operations for Planet to operate using a 6.25% duty cycle in the 2025-2110 MHz (Earth-to-space) frequency band to communicate with the Pelican satellites, except for the 2066.6 MHz uplink, which Planet must operate with a duty cycle of 5%.²⁰
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¹² See ICFS File No. SAT-MOD-20150408-00019 (granted Aug. 31, 2016).

¹³ See ICFS File No. SAT-MOD-20170317-00053 (granted June 29, 2017).

¹⁴ See ICFS File No. SAT-MOD-20191217-00148 (granted March 16, 2020).

¹⁵ See ICFS File No. SAT-MOD-20200615-00076 (granted March 18, 2021).

¹⁶ See *Planet Labs PBC, Application for Modification of License*, Order, 38 FCC Rcd 7897, ICFS File No. SAT-MOD-20220421-00042 (rel. Aug. 31, 2023) (*Planet Aug. 2023 Order*). Planet's modification application was granted-in-part and deferred-in-part with respect to the requests for an additional 25 Pelican satellites and replacement satellites and for certain operations in the 6225-6425 MHz band. *Id.*, Attachment to Grant at conditions 8, 14.

¹⁷ See ICFS File No. SAT-MOD-20240723-00157 (granted-in-part, deferred-in-part Nov. 21, 2024, reissued Jul. 10, 2025).

¹⁸ See *id.*

¹⁹ See ICFS File No. SAT-MOD-20240723-00157 (granted-in-part, deferred-in-part Sept. 25, 2025).

²⁰ ICFS File Nos. SAT-MOD-20231031-00269, SAT-AMD-20231127-00290 (granted-in-part, deferred-in-part Dec. 20, 2024).

GRANT
Planet Labs PBC
SAT-MOD-20260720-00299

	Authority to operate inter-satellite link (ISL) operations with a single satellite in the Pelican constellation in the 27.5-29.1 and 29.5-30 GHz bands, limited to short duration demonstrations to certain medium Earth orbit O3b mPOWER satellites and Telesat low Earth orbit Croupier satellites in accordance with condition 2 of the grant for a period of 180 days.²¹ Authority to: (1) increase the total number of Flock satellites authorized to be deployed and operated from 544 to 744, with the additional 200 satellites operating at altitudes no higher than 550 km;²² (2) transmit inter-satellite links in the 6225-6425 MHz band using Pelican satellites to communicate with SES GSO satellites;²³ (3) increase the number of Pelican satellites authorized to be deployed and operated under the current first-generation design from 7 to 24 satellites;²⁴ (4) authorize Pelican satellites 2-10 to operate at a 440 km nominal altitude (+/- 25 km) and Pelican satellites 3-10 to be inserted at altitudes up to 535 km; and (5) authorize up to six of the first ten Pelican satellites to operate either in sun-synchronous orbit (SSO) or at an inclination of 53 degrees (+/- 2 degrees).²⁵ Modification of Planet's license to authorize: (1) the launch and operation of Pelican satellites 11-24 using Planet's second generation Pelican (Pelican V2) spacecraft design; (2) a single Pelican V2 spacecraft to be equipped with a steerable Ka-band antenna and to undertake limited, temporary intersatellite link (ISL) demonstrations as part of the National Aeronautics and Space Administration (NASA) Communications Service Project (CSP).²⁶ Modification of Planet's license to authorize the use of an L-band radio terminal for inter-satellite links (ISLs) on 6 Pelican V1 or V2 satellites, as an end user of the Inmarsat system.²⁷
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²¹ Planet Labs PBC, Application to Modify License, ICFS File No. SAT-MOD-20240830-00196 (granted Jul. 30, 2025).

²² Planet fulfilled milestone and bond obligations imposed as conditions to a previous grant of authority to operate up to 28 NGSO Flock satellites in the 8025-8400 MHz band. *See* ICFS File No. SAT-MOD-20140321-00032 (granted Jun. 18, 2014). Because of the need for Planet to continuously replenish its satellite constellation within the duration of its license term, the Division did not impose additional milestones or bond conditions in connection with the license modification for the Flock satellites. We find that warehousing concerns are addressed in this situation given the opportunity for additional entrants to operate in the same frequencies.

²³ *See* Letter from Daniel C.H. Mah, Vice President, Legal & Regulatory Affairs, New Skies Satellites B.V. (SES), to Marlene H. Dortch, Secretary, FCC, ICFS File No. SAT-MOD-20220421-00042 (filed Feb. 1, 2023).

²⁴ *See* Letter from Danielle Piñeres, Planet Labs PBC, to Marlene H. Dortch, Secretary, FCC, ICFS File No. SAT-MOD-20220421-00042 (filed June 17, 2025) (reducing the total number of requested simultaneously operational Pelican satellites from 32 to 24 satellites).

²⁵ ICFS File Nos. SAT-MOD-20231031-00269; SAT-AMD-20250130-00033; SAT-AMD-20231127-00290; SAT-MOD-20220421-00042; SAT-MOD-20240723-00157; SAT-MOD-20250527-00129 (granted and granted-in-part, deferred-in-part Feb. 5, 2026).

²⁶ ICFS File Nos. SAT-MOD-20251117-00319; SAT-AMD-20251219-00391 (granted Apr. 7, 2026, reissued June 1, 2026, to correct that the action taken was granted-in-part, deferred-in-part).

²⁷ *See* ICFS File Nos. SAT-MOD-20251117-00319; SAT-AMD-20251219-00391; SAT-MOD-20250527-00129 (granted Jun. 1, 2026). *See also* Letter from Danielle J. Piñeres, Deputy General Counsel & Vice President of Regulatory Affairs & Policy, Planet Labs PBC, to Marlene H. Dortch, Secretary, FCC, ICFS File No. SAT-MOD-20250527-00129 (July 7, 2025) (*Planet Supplemental Filing*). The application was further granted-in-part for launch authority for an L-band radio on 6 additional Pelican V1 satellites. *See* ICFS File No. SAT-MOD-20250527-00129 (granted-in-part, deferred-in-part Mar. 6, 2026). Planet filed a supplemental letter providing additional

GRANT
Planet Labs PBC
SAT-MOD-20260720-00299

Service Area(s):	Global. ²⁸
Frequencies:	8025-8400 MHz (space-to-Earth) (remote sensing data and telemetry) (Flock, SkySat, and Pelican) 2025-2110 MHz (Earth-to-space) (remote sensing data and command) (Flock, SkySat, and Pelican) 25.5-27.0 GHz (space-to-Earth) (data downlink) (Pelican satellites only) 401-402 MHz (space-to-Earth) and 449.75-450.25 MHz (Earth-to-space) (early-phase and emergency backup, as well as ranging and orbit determination on a non-emergency basis) (Flock satellites only)²⁹ 161.9625-161.9875 MHz (AIS 1) and 162.0125-162.0375 MHz (AIS 2) (up to 3 demonstration satellites) (Flock satellites only) <u>Inter-satellite links:</u>³⁰ 4000-4200 MHz (space-to-space) (inter-satellite link) (reception by Pelican satellites only) 6225-6425 MHz (space-to-space) (inter-satellite link) (transmission by Pelican satellites only) 27.5-29.1 GHz (space-to-space) (inter-satellite link) (reception by Pelican satellites only) 29.5-30 GHz (space-to-space) (inter-satellite link) (transmission by one Pelican satellite)³¹

technical context to support Planet's application for authorization to use portions of Inmarsat's L-band spectrum for inter-satellite links (ISLs) on Planet's Pelican spacecraft on a non-interference basis. *See* Letter from Danielle J. Piñeres, Deputy General Counsel & Vice President of Regulatory Affairs & Policy, Planet Labs PBC, to Marlene H. Dortch, Secretary, FCC, ICFS File No. SAT-MOD-20250527-00129 (Mar. 20, 2026) (*Planet L-Band Modification Supplement*).

²⁸ *See* ICFS File No. SAT-MOD-20170713-00103, Schedule S Tech Report at Item S6; ICFS File No. SAT-MOD-20191217-00148, Schedule S Tech Report and Exhibit 43 at 39-74.

²⁹ *See* ICFS File No. SAT-AMD-20250130-00033 (noting the updated UHF uplink channel of 450.1 MHz for Planet's new Flock satellites, as well as some of its existing Flock satellites based on request by federal government spectrum users during pre-coordination discussions). Narrative at 1.

³⁰ Planet's Pelican satellites would communicate with certain non-U.S. licensed SES satellites operating in geostationary satellite orbit (GSO). *See* Letter from Daniel C.H. Mah, Vice President, Legal & Regulatory Affairs, New Skies Satellites B.V. (SES), to Marlene H. Dortch, Secretary, FCC, ICFS File No. SAT-MOD-20220421-00042 (filed Feb. 1, 2023). SES states that it has made arrangements with Planet for its Pelican constellation to communicate with the following SES C-band satellites, all of which are Netherlands licensed and have been granted U.S. market access: (1) NSS-9 at 177° W.L. (Call Sign S2756); (2) SES-4 at 22° W.L. (Call Sign S2828); and (3) SES-6 at 40.5° W.L. (Call Sign S2870). *Id.* Pelican will also communicate with another Netherlands-licensed SES spacecraft, NSS-12 at 57° E.L. *Id.*

³¹ Operations in the 27.5-29.1 GHz and 29.5-30 GHz frequency bands were previously authorized for and limited to Pelican satellites for 180-day, time-limited demonstration operations as specified in the authorization. *See* ICFS File No. SAT-MOD-20240830-00196, condition 2 (granted Jul. 30, 2025). Specifically, Planet was permitted to operate, for ISL testing purposes, in the 27.5-29.1 and 29.5-30 GHz bands on a non-conforming basis using a single satellite in its Pelican constellation for three demonstrations, on an unprotected and non-interference basis. Planet was authorized for a period of 60 days for one Pelican satellite for its Demo 1 to validate use of Ka-band hardware; for a period of 180 days for one Pelican satellite for its SES Demo supporting the NASA Communications Service Project (CSP); and for a period of 180 days for one Pelican satellite for its Telesat Demo supporting the NASA CSP. *See id.*

GRANT
Planet Labs PBC
SAT-MOD-20260720-00299

	18.1-18.6 GHz, 18.8-19.3 GHz, and 19.7-20.2 GHz (inter-satellite link) (transmission by one Pelican satellite) ³²
	1525-1559 MHz (space-to-space) (inter-satellite link) (reception by Pelican satellites only)
	1626.5-1660.5 MHz (inter-satellite link) (transmission by Pelican satellites only)
Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications and commitments 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’s operations in the 401-402 MHz (space-to-Earth) and 449.75-450.25 MHz (Earth-to-space) bands are subject to the following conditions: a. Operations of the Planet Flock satellites in the 401.3 MHz (space-to-Earth) to “Low Speed Only” stations³³ must cease when the Argos-4 satellites³⁴ are within view of those earth stations. b. In order to protect NOAA radiosondes operations in the United States, operations in 401.3 MHz (space-to-Earth) are limited to the Flock satellite system transmissions and shall not exceed the long-term interference criteria limit of -162.4 dBW, as specified in Table 2 (Type C) of Recommendation International Telecommunication Union-Radiocommunication Sector (ITU-R) RS.1263-3. 2. Planet’s operations in the 2025-2110 MHz (Earth-to-space) band are subject to the following conditions: a. Use of the 2025-2110 MHz band (Earth-to-space) will be limited to 6.25% duty cycle per satellite (except for the 2066.6 MHz uplink, which must not exceed a duty cycle of 2.6% satellites, per earth station, and no emissions on 2086.1 MHz when the NASA International Space Station (ISS), NORAD ID 25544, is within 5 degrees of the respective earth station antenna boresight. Planet’s S-band uplink to maintain min C/I of 25 dB so max EIRP (per carrier) must not exceed 46 dBW.³⁵ b. For uplinks centered at 2083 MHz, earth stations supporting SkySat transmissions must cease when the	

³² Operations in the 27.5-29.1 GHz and 29.5-30 GHz and in the 18.1-18.6 GHz, 18.8- 19.3 GHz, and 19.7-20.2 GHz band are authorized for two time-limited demonstration operations. Specifically, Planet is permitted to operate, for ISL testing purposes, in the 27.5-29.1 and 29.5-30 GHz bands and in the 18.1-18.6 GHz, 18.8- 19.3 GHz, and 19.7-20.2 GHz bands on a non-conforming basis using either a Pelican V2 or the Pelican 12 satellite for two demonstrations, on an unprotected and non-interference basis. See ICFS File No. SAT-MOD-20251117-00319; SAT-AMD-20251219-00391 (granted Apr. 7, 2026, reissued Jun. 1, 2026, to correct that the action taken was granted-in-part, deferred-in-part). Planet is authorized for a period of 60 days for one Pelican satellite for its Demo 1 to validate use of Ka-band hardware; and for a period of 180 days for one Pelican satellite for its SES medium Earth orbit (MEO) O3b satellite Demo supporting the NASA Communications Service Project (CSP).

³³ “Low Speed Only” earth stations include the following: Fairbanks, AL.; Brewster, WA; Ningi, AUS; Oahu, HI; Cape Town, SA; Keflavik, Iceland; Goonhilly, UK; Maddock, ND USA; Awarua, New Zealand; and Inuvik, Canada.

³⁴ The Argos-4 satellites included in this authorization are the Gazelle (NORAD ID: 54023) and the Oceansat-3/EOS-6 (NORAD ID: 54361).

³⁵ Pelican satellites uplink transmission at 2066.6 MHz from the Chitose, Japan earth station must be limited to a maximum duty cycle of 16% during periods of mutual visibility with the Suomi NPP (NORAD ID: 37849), JPSS-1 (NORAD ID: 43013), JPSS-2 (NORAD ID: 54234), JPSS-3 (NORAD ID: TBD launch FY27), and JPSS-4 (NORAD ID: TBD launch FY32) space-to-space TDRS forward links; specifically, TDRS-06 (NORAD ID: 22314), TDRS-07 (NORAD ID: 23613), TDRS-08 (NORAD ID: 26388), TDRS-10 (NORAD ID: 27566), TDRS-11 (NORAD ID: 39070), TDRS-12 (NORAD ID: 39504), and TDRS-13 (NORAD ID: 42915).

GRANT
Planet Labs PBC
SAT-MOD-20260720-00299

- ISS (NORAD ID: 25544) is within 5 degrees of the respective earth station antenna boresight.
- c. For uplinks centered at 2056.6 MHz, earth stations supporting the Flock or Pelican satellites must cease all transmissions when the future NASA Landsat-Next spacecraft are within 10 degrees of the respective earth station antenna boresight. It may be possible to relax this condition for launch and early orbit phase (LEOP) operations (defined as the first ten (10) days of operation after launch) contingent upon successful coordination with NASA. Coordination requests must be submitted to NASA (hq-satcoord@mail.nasa.gov) at least thirty (30) days prior to launch.
 - d. For uplinks centered at either 2054.7 MHz or 2057.3 MHz, the maximum transmit duty cycle from each supporting earth station to each individual Flock satellite must be limited to 6.5%, and operations on each frequency must involve no more than a total of 14 Flock satellites at any given time.
 - e. For uplinks centered at either 2066.6 MHz or 2096.1 MHz, operations on each frequency must involve no more than a total of 14 satellites at any given time from the Pelican satellites, the separately-authorized Tanager satellites,³⁶ or any combination of the two.
3. Planet's space-to-space operations in the 4000-4200 MHz and 6225-6425 MHz bands are subject to the following condition:
- a. Planet's request for waiver of the U.S. Table, 47 CFR § 2.106(a), for communications between its Pelican satellites and certain satellites operating in the GSO arc (i.e., communications in the space-to-space direction) was previously GRANTED.³⁷ We note that while the C-band frequencies are not allocated for inter-satellite operations, in this particular case, given the nature of Planet's operations and Planet's willingness to accept a frequency assignment on a non-interference, unprotected basis, we found that Planet is able to operate consistent with its authorization without causing harmful interference.
4. Planet's operations in the 8025-8400 MHz (space-to-Earth) band are subject to the following condition:
- a. Operations pursuant to this authorization must be in compliance with the terms of the Memoranda of Agreement between Planet and the National Aeronautics and Space Administration (NASA) pertaining to operations in the frequency band 8025-8400 MHz.³⁸ Transmissions of remote-sensing and telemetry data in the 8025-8400 MHz frequency band may only be made to earth stations coordinated with NASA.³⁹ Planet must provide the FCC with a list of coordinated earth stations, and must provide the FCC with an updated list within ten business days following any changes to the list.
5. We previously GRANTED Planet's request for waiver of the U.S. Table, 47 CFR § 2.106(a), to receive inter-satellite signals from the Inmarsat satellite system in the 1525-1559 MHz (receive) band and to transmit

³⁶ See ICFS File Nos. SAT-LOA-20220920-00112; SAT-AMD-20231013-00251 (granted-in-part, deferred-in-part May 10, 2024).

³⁷ These operations were previously granted-in-part. See ICFS File No. SAT-MOD-20220421-00042 at conditions 13 and 14 (granted-in-part Aug. 31, 2023; reissued Sept. 28, 2023).

³⁸ This includes, for the Flock satellites, transmissions in the 8025-8400 MHz band to the Maddock, ND, and Keflavik, Iceland, earth stations. See ICFS File No. SAT-MOD-20170713-00103 at para. 8 (grant-in-part May 24, 2018).

³⁹ Planet has executed written coordination agreements with NASA, which include identification of the earth stations with which Planet may communicate in the 8025-8400 MHz band and specification of a process by which to remove and add earth stations. See ICFS File No. SAT-MOD-20170713-00103, Narrative, Exhibit 43, at 1. Planet has filed a list of coordinated earth stations for the Flock satellites with the Commission in accordance with a condition on the Flock satellite authorization. See Letter from Craig Scheffler, Spectrum Manager, Planet Labs, Inc. to Marlene H. Dortch, Secretary, FCC, ICFS File No. SAT-MOD-20170713-00103 (filed Aug. 1, 2018); see also ICFS File No. SAT-MOD-20170713-00103, Narrative, Exhibit 43 at 1.

GRANT
Planet Labs PBC
SAT-MOD-20260720-00299

inter-satellite signals to the Inmarsat satellite system in the 1626.5-1660.5 MHz (transmit) band.⁴⁰ Waiver is justified since Planet's planned use of these frequencies, as a customer of Inmarsat, for relay communications with the Inmarsat Broadband Global Access Network (BGAN) will enable Planet to downlink imagery data and/or data insights produced with reduced latency to customers. Planet states that its proposed operations will not cause harmful interference since Inmarsat will assign channels to the spacecraft consistent with its coordination agreements with other operators in the band. Planet will accept interference from other authorized operators, conform in all relevant respects with the rules governing Inmarsat's existing service, and not exclude other operators from use of the frequency bands.⁴¹ Planet's intersatellite operations with Inmarsat are subject to the following conditions:

- a. Planet's operations in these bands must be on an unprotected, non-interference basis.
 - b. Planet must not use the 1544-1545 MHz band for its inter-satellite operations.⁴²
 - c. Planet must not use the 1645.5-1646.5 MHz band for its inter-satellite operations.⁴³
6. Planet's operations in the 25.5-27.0 GHz (space-to-Earth) band are subject to the following condition:
- a. In the 25.25-27.5 GHz band, power flux density operations must not exceed limits in Recommendation ITU-R SA.1862, recommends #5.
7. Planet's operations in the 18.1-18.6 GHz and 18.8-20.2 GHz bands must not exceed a power flux-density level of $-110 \text{ dB(W/(m}^2 \cdot 200 \text{ MHz))}$ at the surface of the oceans across the 200 MHz of the 18.6-18.8 GHz band, in accordance with Annex 3 of Resolution 679 (WRC-23). Planet's radiofrequency communications are also subject to the following conditions:
- a. Transmissions in the 401-402 MHz, 449.75-450.25 MHz, 2025-2110 MHz and 8025-8400 MHz are limited to the center frequencies coordinated with Federal users. Additionally, the coordinated earth stations are noted in the Appendix for the appropriate satellite missions.
 - b. This authorization includes the previously-granted waiver of the U.S. Table, 47 CFR § 2.106(a), to allow non-conforming use of the 2025-2110 MHz band and the 8025-8400 MHz band in support of Planet's limited demonstration of propulsion technology, subject to the condition that Planet accepts any interference from authorized services in these bands in connection with its limited propulsion

⁴⁰ See *Planet June 2026 Grant Stamp* at condition 5. Planet confirmed that its modems operating on the Inmarsat L-band frequencies have an out-of-band EIRP density that complies with the limits listed in Table 8 of ETSI EN 301 473 V2.1.2. See ICFS File No. SAT-MOD-20250527-00129, Narrative at 7. We determined that the operating characteristics described in the Planet L-Band Modification Supplement, in addition to the fact that the operations are authorized on an unprotected and non-interference basis, will ensure there is no harmful interference from Planet's operations and declined to impose additional conditions as suggested by AST SpaceMobile and Ligado. See *id.*

⁴¹ See ICFS File No. SAT-MOD-20250527-00129, Narrative, at 5.

⁴² The Mobile-Satellite Service (MSS) allocation in which the Inmarsat MSS system operates and that encompasses the 1525-1559 MHz band does not include a space-to-space directional indicator, and, under section 2.106(a), (b)(356) of the Commission's rules, MSS use of the 1544-1545 MHz band is limited to distress and safety communications (see ITU Article 31). 47 CFR § 2.106(a), (b)(356).

⁴³ The MSS allocation in the U.S. Table in which the Inmarsat MSS system operates and that encompasses the 1626.5-1660.5 MHz band does not include a space-to-space directional indicator, and, under section 2.106(a), (b)(375) of the Commission's rules, use of the 1645.5-1646.5 MHz band for ISL is limited to distress and safety communications (see ITU Article 31). 47 CFR § 2.106(a), (b)(375). We note that Inmarsat was not a party to this application and therefore these waivers do not apply to any operations of its system for space-to-space inter-satellite communications in the 1525-1559 MHz and 1626.5-1660.5 MHz frequency bands.

GRANT
Planet Labs PBC
SAT-MOD-20260720-00299

demonstration and that transmissions in the 8025-8400 MHz band are subject to the agreement regarding the Flock satellites reached between Planet and NASA in this band.⁴⁴

- c. This authorization includes the previously-granted waivers of the modified processing round requirements of 47 CFR §§ 25.156 and 25.157 for Planet's operations in the 8025-8400 MHz, 25.5-27.0 GHz, 4000-4200 MHz and 6225-6425 MHz bands.⁴⁵
 - d. Because Planet must comply with technical requirements in Part 2 of the Commission's rules and the above-referenced power flux-density limits, which should prevent harmful interference to other operations in the relevant frequency bands, Planet's request for a waiver of the default service rules in 47 CFR § 25.217(b) was granted, including for the additional operations authorized for its Pelican satellites.⁴⁶
8. Planet is also subject to the following conditions regarding its Flock satellites:
- a. The number of simultaneously operational Flock satellites must not exceed 200.⁴⁷
 - b. No more than 120 Flock satellites may be deployed to orbits that exceed an apogee altitude of 550 kilometers.
 - c. Deployment of a Flock satellite into an orbit with an inclination of 51.6 degrees, plus or minus 0.1 degree, at an altitude above the ISS, is not authorized by this grant.
9. Planet 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:⁴⁸
- a. The number of conjunction events identified for Planet's 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.
 - b. Planet must report any loss of control of Pelican satellites at altitudes above 350 km⁴⁹ not later than

⁴⁴ See ICFS File No. SAT-MOD-20200615-00076 at condition 2 (granted March 18, 2021).

⁴⁵ See ICFS File No. SAT-MOD-20200615-00076, citing *DigitalGlobe, Inc.*, Order and Authorization, 20 FCC Rcd 15696 at para. 8 (Sat. Div., Int'l Bur. 2005). See also ICFS File No. SAT-MOD-20220421-00042.

⁴⁶ See, e.g., *Planet Jan. 2026 Grant Stamp* at condition 6(d), citing *Digital Globe Inc.*, 20 FCC Rcd 15696, 15699 at para. 7.

⁴⁷ The total number of simultaneously operational Flock satellites refers specifically to those satellites providing EECS and does not include satellites that continue to operate in TT&C frequency bands as part of an approved post-mission disposal plan.

⁴⁸ We note that the Commission recently adopted revised reporting requirements for satellite systems. See *Space Modernization for the 21st Century*, SB Docket No. 25-306, Report and Order, FCC 26-47 (rel. Jul. 23, 2026) (*Space Modernization Report and Order*). When the rules adopted in the *Space Modernization Report and Order* come into effect, the applicable rules will supersede this condition. *Id.*, at para. 270, Appendix A at § 100.102.

⁴⁹ The first Pelican satellite will operate in SSO at an inclination of 96.7 degrees, with an expected commissioning altitude of 525 km +/- 25 km, and then enter its operational altitude of 325 km +/- 25 km, within approximately six to twelve months; and the next six Pelican satellites, with an expected commissioning altitude between 250 km and 550 km, and then an approximately three-month transfer to their final operational altitude of 325 km +/- 25 km. See ICFS File No. SAT-MOD-20220421-00042, Planet Tech. App. at 1-2.

GRANT
Planet Labs PBC
SAT-MOD-20260720-00299

10 days following the loss of control.⁵⁰

10. This grant includes the previously granted 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.

11. The authorization for each of the Flock, SkySat, and Pelican constellations will become null and void if, at any point during the license term, there are no satellites operating pursuant to the respective system authorization. This authorization may be subject to additional conditions, or a reduction in the number of authorized Flock satellites, in the event future deployment rates do not justify an authorization for 200 operational satellites.

12. With respect to the 24 authorized Pelican satellites, Planet is subject to the following:⁵¹

- a. Planet maintains on file its 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 must launch 50 percent of the maximum number of authorized Pelican space stations, place them in the assigned orbits, and operate them in accordance with this grant no later than **August 31, 2029**, and must launch the remaining Pelican space stations necessary to complete its authorized service constellation, place them in their assigned orbits, and operate them in accordance with the authorization no later than **August 31, 2032**. 47 CFR § 25.164(b).⁵²

13. Within 30 days after deployment of each satellite pursuant to this authorization, Planet must file a notification with the Commission specifying the apogee and perigee altitudes and orbital inclination for each satellite,⁵³ and identify the specific satellites that will operate on which authorized frequencies pursuant to the respective authorizations and conditions.

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).

⁵⁰ Condition corrected in reissue of grant conditions on September 28, 2023, to conform to the Division's order in DA 23-799. *See Planet Labs PBC, Application for Modification of License*, ICFS File No. SAT-MOD-20220421-00042, Order, DA 23-799, para. 4, n.9 (SB, SPPD rel. Aug. 31, 2023).

⁵¹ We note that this milestone condition extends beyond the current license term. The identified milestone dates would become applicable in the event of a license extension.

⁵² We note that although we authorize Planet to operate in additional frequencies on its Pelican satellites and with an additional 17 Pelican satellites, we retain the current milestones for the Pelican constellation. *See* 47 CFR § 25.164(h).

⁵³ *See Supplement to May Launch Notification for Pelican Satellites Under Call Sign S2912*, Letter from Danielle J. Piñeres, Deputy General Counsel & Vice President, Regulatory Affairs & Policy, Planet Labs PBC, to Marlene H. Dortch, Secretary, FCC (filed July 15, 2026) (providing launch notice of third Pelican form-factor satellite on May 3, 2026, deployed at an orbit of 494 x 512 km with an inclination of 97.4 degrees); *see* Letter from Danielle J. Piñeres, to Marlene H. Dortch, Secretary, FCC (filed May 11, 2026) (providing launch notice of two Pelican satellites on May 3, 2026).

ATTACHMENT TO GRANT
Planet Labs PBC
ICFS File No. SAT-MOD-20260720-00299

Appendix

Federal coordinated earth stations for **PELICAN**:

Svalbard (Norway)
Keflavik (Iceland)
Inuvik, NW (Canada)
Lewisporte, NL (Canada)
Maddock, ND (USA)
Awarua (New Zealand)
Taiki, Hokkaido (Japan)
Chitose (Japan)
Tromsø (Norway)
GCI, Fairbanks, AK (USA)
Punta Arenas (Chile)
Nangetty, Western Aus (AUS)
Goonhilly (United Kingdom)
Singapore

Federal coordinated earth stations for **SKYSAT**:

Maddock, ND (USA)
GCI, Fairbanks, AK (USA)
Inuvik, NW (Canada)
Punta Arenas (Chile)
Goonhilly (United Kingdom)
Svalbard (Norway)
Tromsø (Norway)
Awarua (New Zealand)
Dededo, Guam (USA)
Nangetty, Western Aus (AUS)
Taiki, Hokkaido (Japan)
Singapore
Lewisporte, NL (Canada)
Keflavik (Iceland)
Jeju (Korea)

Federal coordinated earth stations for **FLOCK**:

Maddock, ND (USA)
GCI, Fairbanks, AK (USA) (S-band and X-band only)
Inuvik, NW (Canada)
Punta Arenas (Chile) (S-band and X-band only)

ATTACHMENT TO GRANT
Planet Labs PBC
ICFS File No. SAT-MOD-20260720-00299

Appendix (cont.)

Goonhilly (United Kingdom)
Svalbard (Norway) (S-band and X-band only)
Tromsø (Norway) (S-band and X-band only)
Awarua (New Zealand)
Dededo, Guam (USA) (S-band and X-band only)
Nangetty, Western Aus (AUS)
Taiki, Hokkaido (Japan) (S-band and X-band only)
Singapore (S-band and X-band only)
Lewisporte, NL (Canada) (S-band and X-band only)
Keflavik (Iceland)
Brewster, WA (USA) (UHF only)
Fairbanks, AK (University of AK Fairbanks) (UHF only)
Oahu, HI (UHF only)
Cape Town, South Africa (UHF only)