

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

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	)	
In the Matter of	)	
	)	
Umbra Lab, Inc.,	)	File No.: SAT-MOD-_____
	)	
Modification Application for a Non-	)	Call Sign: S3220
Geostationary Satellite Orbit System in the	)	
Earth Exploration-Satellite Service	)	
	)	

MODIFICATION APPLICATION

Umbra Lab, Inc. (“Umbra”) requests to modify the authorization for its above-referenced satellite space station license.¹

Umbra requests a limited modification to reflect the updated orbital inclination and initial deployment altitude for Umbra-13 and Umbra-14. Specifically, satellites Umbra-13 and Umbra-14 will operate at an inclination of 53.0 degrees (± 0.1 degrees) and will be initially deployed at 595 km (± 20 km). If required following deployment, Umbra will lower orbit to operate within the already-authorized nominal operating altitude range of 535 km to 595 km. Umbra will continue SAR operations during the terminal phase of flight down to an altitude of 325 km.

In the worst-case scenario that an Umbra satellite is deployed dead-on-arrival (“DOA”) while fully stowed at an altitude of 615 km, it will re-enter the atmosphere in at most 40 years. Except as stated specifically in this application, Umbra is not requesting any other changes to its license or authorized satellite operations and certifies that such operations remain unchanged.

¹ See Stamp Grant, Umbra, ICFS File SAT-MOD-20251226-00401 (granted March 10, 2026).

Umbra is preparing the relevant ITU submission for the proposed modification and will provide those documents to the Space Bureau as soon as possible.

Respectfully submitted,

By: /s/ Iulia Davies

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Dated: July 20, 2026

ATTACHMENT

Technical Certification

I, Jake Cummings, hereby certify, under penalty of perjury, that I am the technically qualified person responsible for the preparation of the engineering information contained in the technical portions of the foregoing application, that I am familiar with Part 25 of the Commission's rules, and that the technical information is complete and accurate to the best of my knowledge and belief.

By: /s/ Jake Cummings

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