

EXHIBIT 1

REQUEST FOR SPECIAL TEMPORARY AUTHORIZATION (Response to Question 12, FCC Form)

Pursuant to Section 25.120(b)(2) of the Federal Communications Commission's ("Commission's") rules,¹ Lynk Global Inc. ("Lynk") respectfully requests a 180 day renewal of special temporary authorization ("STA")² to operate its Part 25 small satellite system (the "Lynk Smallsat System") with up to three non-U.S. earth stations for limited feeder link operations in the 2025-2110 MHz and 2200-2290 MHz bands ("S-band").³ Lynk continues to diligently develop its ground network and expand service to countries around the world. An extension is warranted as it will enable continued deployment of the Lynk Smallsat System until Lynk's planned Australian Ka-band feeder link earth station located north of Alice Springs airport becomes operational.⁴ Expeditious grant of this STA renewal strongly supports the public interest by enhancing Lynk's ability to bring its advanced direct-to-cellular services to unconnected and underconnected communities around the world.

Lynk is authorized to operate the Lynk Smallsat System consistent with the technical specifications set forth in its small satellite license application, as modified,⁵ and subject to conditions imposed in its license.⁶ Under that license, the Lynk Smallsat System is permitted to operate in the S-band on an emergency backup basis for telemetry, tracking, and control

¹ 47 C.F.R. § 25.120(b)(2).

² Lynk is currently operating under a 180-day STA grant of authority to operate the Lynk Smallsat System under the same terms specified in this STA request. See Lynk Global, Inc., *Stamp Grant*, ICFS File No. SAT-STA-20250610-00142 (granted Jul. 17, 2025). Previously, Lynk operated the Lynk Smallsat System pursuant to 30-day grants of STA. See Lynk Global, Inc., *Stamp Grant*, ICFS File No. SAT-STA-20250210-00039 (granted Mar. 7, 2025); Lynk Global, Inc., *Stamp Grant*, ICFS File No. SAT-STA-20250403-00089 (granted May 23, 2025); Lynk Global, Inc., *Stamp Grant*, ICFS File No. SAT-STA-20250507-00115 (granted May 23, 2025); Lynk Global, Inc., *Stamp Grant*, ICFS File No. SAT-STA-20250604-00136 (granted June 12, 2025).

³ See Lynk Global, Inc., ICFS File No. SAT-MOD-20230824-00210 (grant reissued Mar. 21, 2024) ("Modification Grant") (incorporating conditions of Lynk's existing smallsat license and amending other conditions); see also Lynk Global, Inc., Application to deploy and operate space stations filed under the FCC streamlined small space station authorization process, *Order and Authorization*, 37 FCC Rcd 10681 (IB 2022) ("Lynk Smallsat Order"); see also Lynk Global, Inc., ICFS File Nos. SAT-MOD-20240108-00006; SAT-MOD-20241209-00276 (granted Apr. 29, 2025) ("2025 Modification Grant").

⁴ The 2.4m Ka-band earth station will be located north of the Alice Springs airport at the following coordinates: Lat. -23.78136, Long. 133.87736.

⁵ See 2025 Modification Grant; Modification Grant; and Lynk Smallsat Order.

⁶ Lynk Smallsat Order ¶ 34.

(“TT&C”) using earth stations outside the United States.⁷ Lynk is also required to coordinate any such S-band operations with NTIA and various federal government agencies prior to commencing operations.⁸ Consistent with this requirement, Lynk notified the Commission that it completed coordination to conduct emergency back-up TT&C operations with six additional non-federal S-band earth stations located outside the United States and its Possessions.⁹ Finally, Lynk must coordinate such earth station operations with local broadcasting coordinators within the United States and its possessions if the earth stations will be located 100 miles or less from the United States or its possessions.¹⁰

Lynk proposes here to continue operating with up to three S-band feeder link earth stations located in Australia on a temporary basis. The new earth station sites are provided below. Lynk would otherwise operate consistent with the conditions under the Modification Grant, the 2025 Modification Grant, and Lynk Smallsat Order.¹¹

<u>Location</u>	<u>Transmit (MHz)</u>	<u>Latitude</u>	<u>Longitude</u>
Sydney, Australia	2260 +/- 0.3375	-33.869	151.209
Peterborough, Southern Australia	2260 +/- 0.3375	-32.962	138.850
Nangetty, Western Australia	2260 +/- 0.3375	-29.010	115.342

As shown by the previous 180-day STA and 30-day STA that Lynk has been operating

⁷ Modification Grant at Condition 5; 2025 Modification Grant at Condition 7.

⁸ Modification Grant at Condition 6; 2025 Modification Grant at Condition 8 (requiring coordination with the Air Force Spectrum Management Office, National Aeronautics and Space Administration, and the Department of Commerce/ National Oceanic and Atmospheric Administration, and the Department of the Navy).

⁹ Letter to Marlene H. Dortch, Secretary, FCC, from Michael McMenamin, Vice President Regulatory Affairs, Lynk, ICFS File Nos. SAT-LOA-20210511-00064, SAT-MOD-20230824-00210 (filed Feb. 10, 2025). The twelve coordinated S-band TT&C earth station locations are listed in Appendix A.

¹⁰ *Id.* The three earth stations in this application are not within 100 miles of the United States or its possessions. Therefore, coordination with local broadcasting coordinators is not required.

¹¹ To the extent necessary, Lynk requests a waiver of the U.S. Table of Frequency Allocations, 47 C.F.R. § 2.106, to conduct feeder link operations in the S-band frequencies on a non-harmful interference basis. See 47 C.F.R. § 1.3. Lynk was previously granted a waiver of this rule under the condition that it would coordinate proposed S-band operations with relevant federal agencies and only use earth stations outside the United States. See Lynk Smallsat Order ¶ 28 (“We grant this request for waiver, to the extent necessary, because we find that Lynk’s operations as conditioned by this authorization will not cause harmful interference to stations authorized in accordance with the U.S. Table of Frequency Allocations, section 2.106”). Grant of a waiver is therefore consistent with Commission precedent and would enable Lynk to deliver advanced services to consumers.

under since March 7, 2025, the STA operations will be on an unprotected, non-harmful interference basis and grant of the requested STA raises no interference concerns. Specifically, Lynk's operations within Australia will fully comport with the laws of that country. Moreover, consistent with its License for the Lynk Smallsat System, Lynk has completed coordination for the proposed earth station operations with NTIA, NOAA, the U.S. Navy, the U.S. Air Force, and NASA.¹² The planned S-band operations will also occur at earth stations located in Australia and therefore would not cause interference to any broadcast stations in the band located in the United States or its possessions.¹³ Accordingly, the proposed operations under this STA present no interference concerns.

Considering the foregoing, the requested STA renewal strongly serves the public interest by enabling Lynk to continue deploying its advanced direct-to-cellular service to countries around the world. By enabling temporary use of a limited number of earth stations located in Australia for feeder link operations, Lynk's service will enable prompt access to communications services in remote areas that currently lack basic connectivity, or have limited terrestrial network coverage. The Commission should therefore expeditiously grant the requested STA.

¹² Emails confirming completion of coordination with these agencies are attached as Appendix A to Lynk's 30-day STA application. See Lynk, Narrative, ICFS File No. SAT-STA-20250210-00039, Narrative, Attachment A (filed Feb. 10, 2025).

¹³ Modification Grant at Condition 6; 2025 Modification Grant at Condition 8.

Appendix A
Lynk S-band Earth Stations Coordinated with Federal Agencies

1. Absheron, Azerbaijan
2. Mauritius
3. Punta Arenas
4. Sydney, Australia
5. Peterborough, Southern Australia
6. Nangetty, Western Australia
7. Torri Brianche, Italy
8. Dublin, Ireland
9. Awarua Invercargill, New Zealand
10. Shetland, UK
11. Kandy, Sri Lanka
12. Blönduós, Iceland