

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Application of RBC Signals, LLC for a	)	
60-Day Special Temporary Authorization	)	Call Sign: E230151
to Operate with Non-Geostationary Orbit	)	
Spacecraft	)	File No.:
	)	

**REQUEST FOR 60-DAY SPECIAL TEMPORARY
AUTHORIZATION
(3.7/3.9m “Lease Site” Systems Antenna S-Band Uplinks and
X-band Downlinks Deadhorse, Alaska)**

RBC Signals, LLC (“RBC Signals”), pursuant to Section 25.120 of the Commission’s rules, 47 C.F.R. § 25.120, respectfully seeks a 60-day special temporary authorization (“STA”) to operate its fixed 3.7 and 3.9-meter earth station in Deadhorse, Alaska (the Deadhorse “Lease Site” Systems) to conduct telemetry, tracking, and command (“TT&C”) and payload uplinks in portions of the 2025- 2100 MHz band (Earth-to-space) band and TT&C and payload downlink (Space-to-Earth) operations to support the U.S.-licensed satellite known as Otter24C¹, scheduled for launch in October 2026.

RBC Signals is awaiting a grant of amendment to its earth station application for this same ground system (E230151) to add this satellite as a point of communication to its earth station license² with another round of modifications. RBC Signals respectfully requests the Commission grant this 60-day STA to allow it to provide necessary TT&C support during the pendency of the application for longer-term authority. A grant of this STA will allow for TT&C support for Otter24C while the longer-term license works through process.

¹ See *Starfish Space INC.*, File No. SAT-LOA-20251230-00413 Call Sign S00782 (PN March 27th 2026)

²See *RBC Signals, LLC*, File No. SES-MOD-20241024-02204, Call Sign E230151 (filed Oct. 24, 2024).

I. DISCUSSION

RBC Signals is a Redmond, Washington-based company providing innovative earth station services in the United States and around the world both to U.S. government and commercial clients. RBC Signals has provided similar ground station support for multiple spacecraft from the Lease Site and its nearby Deadhorse 6.0m³ and 4.5m⁴ earth station with no resulting harmful interference. RBC Signals will continue to ensure that its operations will not cause harmful interference to current or future co-frequency operations and that the interests of the United States are accommodated.

RBC Signals seeks to provide TT&C communications using the Lease Site antennas in portions of the 2025-2110 MHz (Earth-to-space) band and TT&C and payload downlink in portions of the 8000-8500 MHz band (Space-to-Earth) to support U.S.-licensed satellite operations, as described below.

A. Satellite Overview

Starfish Space has deployed and operated numerous Otter systems, each with dedicated callsigns and technical characteristics. RBC Signals incorporates by reference the technical and public interest considerations set forth in the underlying satellite applications filed by the satellite operator and highlights the need for TT&C support for this U.S.-licensed satellite.

³ See, e.g., RBC Signals, LLC, File Nos. SES-STA-20230123-00086 (granted Mar. 30, 2023), SES-STA-20221014-01134 (granted Dec. 14, 2022), and SES-STA-20220929-01060 (granted Nov. 28, 2022), SES-LIC-20221121-01273 (Granted Nov. 4, 2024).

⁴ See, e.g., RBC Signals, LLC, File Nos. SES-LIC-20220509-00468, SES-STA-20231106-02412, 0570-EX-CN-2024

B. Summary of Frequency Use

RBC Signals is requesting permission for the uplink and downlink frequencies listed in the summary table below for TT&C operations.

<i>Satellite Designation</i>	<i>Center Frequency (MHz)</i>	<i>Emission Bandwidth</i>	<i>Direction</i>
<i>Otter24C</i>	<i>2027</i>	<i>200 KHz 10 KHz</i>	<i>Earth to Space</i>
<i>Otter24C</i>	<i>2048.5</i>	<i>200 KHz 10 KHz</i>	<i>Earth to Space</i>
<i>Otter24C</i>	<i>2103</i>	<i>200 KHz 10 KHz</i>	<i>Earth to Space</i>
<i>Otter24C</i>	<i>8490</i>	<i>2 MHz 200 KHz 30 KHz 10 KHz</i>	<i>Space to Earth</i>
<i>Otter24C</i>	<i>8200</i>	<i>2 MHz 200 KHz 30 KHz 10 KHz</i>	<i>Space to Earth</i>

C. Frequency Allocations and Compatibility

The United States Table of Frequency Allocations (“Table of Allocations”), Section 2.106 of the Commission’s rules, 47 C.F.R. § 2.106, provides that the 2025-2110 MHz band is allocated on a primary basis to non-Federal terrestrial fixed and mobile services. Non-federal Earth-to-space transmissions may be authorized on a case-by-case basis for space research and Earth exploration-satellite service (“EESS”) operations, so long as such operations are conducted on a non-interference basis with Federal and non-Federal users of the band.⁶ RBC Signals will operate these links on a non-interference basis, as required by the Table of Allocations.

The Table of Allocations also provides that the 2025-2110 MHz band is allocated on a primary basis to space operations, EESS, and space research. In the United States, space operations are limited to federal operators, and EESS use by commercial operators is subject to conditions as may be applied on a case-by-case basis and the limitation that any use may not cause harmful interference to authorized operations. RBC Signals understands that there are certain U.S. government operations conducted in the 2025-2110 MHz band, including use by the National Aeronautics and Space Administration (“NASA”).⁷ RBC Signals will continue its coordination efforts with NASA and other government agencies to ensure compatibility of the proposed operations.

⁶ See 47 C.F.R. § 2.106, fn. US347

⁷ See https://www.ntia.doc.gov/files/ntia/publications/compendium/2025.00-2110.00_01MAR14.pdf.

D. Frequency Coordination and Interference

Previous coordination reports which supported these antennas as well as the nearby 6.0m and 4.5-meter earth station show no interference cases. RBC Signals understands that the satellite operators have coordinated access to the required frequencies for their respective operations. Nonetheless, RBC Signals will operate the Deadhorse Lease Site antennas on an unprotected, non- interference basis and if RBC Signals learns that its operations are causing harmful interference to other operations, it will suspend or modify its operations immediately to resolve such interference.

The 24/7 point of contact and emergency stop contact for the proposed operations is:

John Ames
RBC Signals Operations
Email: john.ames@rbcsignals.com
Mobile: 719.502.6206

E. Waiver Request

To the extent necessary, RBC Signals requests waiver of the Table of Allocations to permit the proposed TT&C transmit operations in the 2025-2110 MHz band. Specifically, a waiver may be appropriate to the extent the Commission concludes that any of the proposed operations do not conform to the available non-Federal allocations in the band.

The Commission may waive any of its rules for “good cause” shown.⁸ In general, waiver is appropriate if (i) special circumstances warrant a deviation from the general rule; and (ii) such deviation would better serve the public interest than would strict adherence to the rule.⁹ Special circumstances justify grant of the requested waivers and grant will not undermine the policy objectives of the rules and will otherwise serve the public interest.

Given RBC Signals’ limited spectrum use, prior use of the same frequency band for the same classification of operations using the Deadhorse Lease Site antennas without interference incident, and successful coordination of these frequencies, the public interest would be served by permitting the Deadhorse Lease Site antennas to support the operations of the satellites identified herein. RBC Signals will continue to ensure that its earth station transmit operations do not increase the potential for interference into current or future U.S. government or commercial users. RBC Signals therefore respectfully requests, if a waiver is needed, that it be granted by the Commission.

⁸ 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).

⁹ See *Northeast Cellular*, 897 F.2d at 1166; see also *WAIT Radio*, 418 F.2d at 1157.

F. Public Interest Consideration

RBC Signals is at the forefront of reinventing TT&C and earth station support solutions and grant of the requested application would promote U.S. leadership in innovative satellite technologies and services. RBC Signals will conduct all operations in accordance with the Commission's rules and requirements. RBC Signals incorporates by reference the public interest considerations included in the satellite application, as well as the operational specifications included in the authorizations, of the subject spacecraft.¹⁰

Grant of this application will further the public interest by enabling TT&C support for the Otter24C Mission. In addition, there have been no instances of harmful interference from TT&C uplink operations at this or nearby facilities in the subject spectrum and RBC Signals will continue to ensure interference-free operations from its Deadhorse Lease Site antennas.

II. CONCLUSION

Based on the foregoing, RBC Signals respectfully requests that the Commission grant this 60-day STA to enable the Deadhorse Lease Site antennas to provide TT&C and payload uplink and downlink services while RBC Signals prepares a more permanent modification request.

¹⁰ RBC requests leave to update the technical or operational data associated with this application should the Commission seek any clarifying or supplemental information in considering this request.

EXHIBIT A

RBC Signals, LLC – Application for ground station operations to support the Otter24C mission from its Deadhorse Lease Site Antennas in Deadhorse, Alaska Call Sign E230151

Antenna 1	
Antenna Description	Safran Legion 400
Antenna size	3.9m
Transmit Center Frequency	Summarized Below
Receive Center Frequency	N/A
Polarization	Right Hand Circular
Transmit Gain	36.7 dBi
Latitude (NAD83)	70°11'28.7"N
Longitude (NAD83)	148° 26' 0.93" W
Emission Bandwidths	Maximum EIRP Density per Carrier dBw/4kHz
100 kHz	46.02

Antenna 2	
Antenna Description	SeaTel Tracker 3700 S/X
Antenna size	3.7m
Transmit Center Frequency	Summarized Below
Receive Center Frequency	N/A
Polarization	Right Hand Circular
Bandwidth	Summarized Below
Transmit Gain	35 dBi @2.03 Ghz
Latitude (NAD83)	70° 11' 27.2" N
Longitude (NAD83)	148° 26' 5.8" W
Emission Bandwidths	Maximum EIRP Density per Carrier dBw/4kHz
100 kHz	44.02

Point of Communication	
Satellite	Otterpup24C
Call Sign	S00782
Satellite Type	NGSO
Orbit*	800-1500 km; 97-102° inclination

