

Exhibit A – Narrative Supplement
STA Request
Applicant: Kongsberg Satellite Services AS
Call Sign: E120025

Kongsberg Satellite Services AS (“KSAT”) respectfully requests an additional 60-day special temporary authorization (“STA”)¹ to operate its transmit/receive satellite earth station in Fairbanks, Alaska (“Station”) (call sign E120025) to support the Planet Labs PBC (“Planet”) Flock satellite constellation (call sign S2912). KSAT requests this STA pending grant of KSAT’s 2025 application to modify the Station license to add the Flock satellites as an additional point of communication for the Station (“2025 Modification Application”).²

KSAT requests that the STA term begin on August 30, 2026, immediately following the expiration of the current STA,³ and to run through October 28, 2026. KSAT requests authority on the same basis as the current STA and there are no technical changes from the current STA.

The Station license, last modified in 2017,⁴ authorizes KSAT to support Planet’s SkySat satellite constellation only⁵ as a point of communication. Planet is the operator of both the Flock and SkySat satellites, which have been consolidated under a single license and call sign (S2912).⁶

Under the requested STA, the Station will transmit to the Flock satellites in the 2025-2110 MHz band (“S-band”) and receive in the 8025-8400 MHz band (“X-band”). KSAT has been advised by Planet that it has completed all necessary Federal coordination, including with NASA, in

¹ 47 C.F.R. § 25.120.

² License Modification Application of Kongsberg Satellite Services AS for its Fairbanks, AK Earth Station, ICFS File No. SES-MOD-20250225-00262 (filed Feb. 25, 2025, AFFPN Jan. 7, 2026) (“2025 Modification Application”). KSAT supplemented the 2025 Modification Application on April 3, 2025.

³ See Application of Kongsberg Satellite Services AS for Special Temporary Authority for a Fairbanks, AK Earth Station, ICFS File No. SES-STA-20260416-01075 (granted June 30, 2026 for a term of July 1, 2026 to Aug. 29, 2026). See also ICFS File No. SES-STA-20251124-01052 (granted Mar. 5, 2026), ICFS File No. SES-STA-20250821-00924 (granted Sept. 30, 2025), ICFS File No. SES-STA-20250411-00572 (granted July 16, 2025).

⁴ See Grant of License Modification Application of Kongsberg Satellite Services AS, ICFS File No. SES-MOD-20170621-00669 (Aug. 9, 2017) (granting a change of the remote control point for the Station to KSAT’s Tromsø Network Operations Center in Tromsø, Norway and of contact information for the Station).

⁵ KSAT has been operating the Station under the 2017 license to support the entire SkySat constellation (SkySats 1-21). The SkySat satellite constellation, owned by Planet’s subsidiary, Terra Bella Technologies Inc., was previously under call sign S2862. In 2021, Planet was granted a license modification that consolidated “the SkySat satellites (Call Sign S2862) and the Flock satellites (Call Sign S2912) under one satellite system license (Call Sign S2912).” See License Modification Application of Planet Labs Inc., ICFS File No. SAT-MOD-20200615-00076 (granted Mar. 18, 2021). KSAT worked with the Earth Station Licensing Division to clarify that KSAT’s authorization was only for operation with SkySat satellites and not the Flock satellites. See, e.g., Email from Pamela Meredith, KMA Zuckert LLP, to Franco Hinojosa, FCC (July 12, 2024) (regarding whether the points of communication in the ICFS generated license for SES-MOD-20170621-00669 should specify SkySat 1-21).

⁶ See *supra* note 5.

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order to operate with the Station,⁷ and that the Station has been added to a list of coordinated earth stations.⁸

Grant of the STA to support operations with Planet’s Flock satellites pending grant of KSAT’s application to modify the Station license is in the public interest. Authorizing KSAT to continue supporting the Flock satellites with the Station will make Planet’s commercial remote sensing service more robust and efficient, which benefits the Planet’s U.S. national security and commercial customers and thus is in the public interest. For these reasons, we respectfully request that the Commission grant this STA.

Frequencies Requested

The following table, which matches the request in the 2025 Modification Application, as supplemented,⁹ lists the frequencies requested for this STA:

Band	Use	Ctr. Freq. (MHz)	Polarization	Emission Designator	Assoc. Antenna
S-band	TT&C (Earth-to-space) (primary)	2056.0	RHCP	1M31F1D	ES 1 & ES 2
S-band	TT&C (Earth-to-space) (backup)	2054.7	RHCP	1M31F1D	ES 1 & ES 2
S-band	TT&C (Earth-to-space) (backup)	2057.3	RHCP	1M31F1D	ES 1 & ES 2
X-band	Data Downlink (space-to-Earth) (primary)	8080.0	RHCP / LHCP	100MG1D	ES 1 & ES 2

⁷ See License Modification Application of Planet Labs PBC, ICFS File No. SAT-MOD-20250527-00129, Attachment to Grant (Mar. 4, 2026), Condition 1.a (“Operations pursuant to this authorization must be in compliance with the terms of the Memoranda of Agreement between Planet Labs and the National Aeronautics and Space Administration (NASA) pertaining to operations in the frequency band 8025-8400 MHz. Transmissions of remote-sensing and telemetry data in the 8025-8400 MHz frequency band may only be made to earth stations coordinated with NASA. 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.”).

⁸ See Memorandum of Agreement between Planet and NASA, Annex 1, Satellites and Earth Stations Applicable in this Agreement, Table A1-2; Planet Ground Stations in this Agreement (updated Aug. 30, 2023) (listing as earth station #2, “GCI, Fairbanks, AK (USA)” at the geographic coordinates 64.81, -147.73).

⁹ KSAT filed a supplement to the 2025 Modification Application Supplement via ICFS on April 3, 2025. The supplement corrects the table in section 2 of the application narrative to list the “Use” for the X-band downlinks as “Data Downlink” (not “TT&C”) to be consistent with the application’s Schedule B and the license for the Flock satellites.

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X-band	Data Downlink (space-to-Earth) (secondary)	8180.0	RHCP / LHCP	100MG1D	ES 1 & ES 2
X-band	Data Downlink (space-to-Earth) (secondary)	8280.0	RHCP / LHCP	100MG1D	ES 1 & ES 2

The frequency channels requested above for the Flock satellites are in addition to those that KSAT is currently authorized to use for operations with the SkySat satellites. KSAT requests no changes to the previously authorized channels that are being used to support the SkySat satellites.

The frequency ranges that correspond to the center frequencies listed above are as follows:

Ctr. Freq. (MHz)	Range: Lower (MHz)	Range: Upper (MHz)	Bandwidth (MHz)
2054.7	2054.045	2055.355	1.31
2056.0	2055.345	2056.655	1.31
2057.3	2056.645	2057.955	1.31
8080.0	8030.00	8130.00	100.00
8180.0	8130.00	8230.00	100.00
8280.0	8230.00	8330.00	100.00

KSAT requests the same technical parameters for the STA that were requested in the 2025 Modification Application. For reference, the technical parameters for the S-band uplinks and X-band downlinks in the 2025 Modification Application, to the extent they differ from the parameters in the current license,¹⁰ are as follows:

1. For all S-band Uplinks (2054.7, 2056.0, and 2057.3 MHz center frequencies):
 - a. Max. EIRP per Carrier (E48): 42.5 dBW
 - b. Max. EIRP Density per Carrier (E49): 17.35 dBW/4kHz
 - c. Modulation and Services (E50): Digital/Telecommand
 - d. Satellite Orbit Type (E51): Non-geostationary
 - e. Range of Satellite Arc Eastern Limit (E54): 0.0
 - f. Range of Satellite Arc Western Limit (E55): 0.0
 - g. Earth Station Azimuth Angle Eastern Limit (E56): 0.0

¹⁰ See *supra* note 4 (2017 modification).

- h. Antenna Elevation Angle Eastern Limit (E57): 5.0
 - i. Earth Station Azimuth Angle Western Limit (E58): 360.0
 - j. Antenna Elevation Angle Western Limit (E59): 5.0
 - k. Max. EIRP Density toward the Horizon (E60): -5.85 dBW/4KHz
2. For all X-band Downlinks (8080.0, 8180.0, 8280.0 MHz center frequencies):
- a. Max. EIRP per Carrier (E48): 0.0 dBW
 - b. Max. EIRP Density per Carrier (E49): 0.0 dBW/4kHz
 - c. Modulation and Services (E50): Digital/Data Downlink
 - d. Satellite Orbit Type (E51): Non-geostationary
 - e. Range of Satellite Arc Eastern Limit (E54): 0.0
 - f. Range of Satellite Arc Western Limit (E55): 0.0
 - g. Earth Station Azimuth Angle Eastern Limit (E56): 0.0
 - h. Antenna Elevation Angle Eastern Limit (E57): 0.0
 - i. Earth Station Azimuth Angle Western Limit (E58): 360.0
 - j. Antenna Elevation Angle Western Limit (E59): 0.0
 - k. Max. EIRP Density toward the Horizon (E60): 0.0 dBW/4KHz

The proposed operations will be in compliance with the power flux-density limits of Footnote US90 of the U.S. Table of Frequency Allocations.¹¹

Under the STA, KSAT will operate the Station on a non-interference basis, including in accordance with Footnote US347 of the U.S. Table of Frequency Allocations (for the S-band transmit operations).¹²

KSAT has coordinated the S-band transmissions of the Station with other local users. Two frequency coordination reports performed by COMSEARCH, one for each antenna, have been completed for the Station with regard to adding the Flock satellites and are attached as Exhibit B (for reference, this is the same Exhibit B that was filed with the 2025 Modification Application). Coordination with the Society of Broadcast Engineers has been completed for the Station with regard to adding the Flock satellites.

A radiation hazard report is attached as Exhibit C (for reference, this is the same Exhibit C that was filed with the 2025 Modification Application).

¹¹ 47 C.F.R. § 2.106(c)(90).

¹² 47 C.F.R. § 2.106(c)(347).

Station Specifications

KSAT requests for the STA that the Total Input Power at the Antenna Flange be 50.0 watts (matching the request in the 2025 Modification Application, Schedule B, Question E38).

Otherwise, all other specifications for the Station or its antennas requested for this STA remain the same as found in the current license.¹³ The following description of the Station antennas reiterates what is in the 2025 Modification Application:

The Station antennas to be used for the Flock satellites will be the same antennas used for the SkySat satellites, ES 1 and ES 2 (located at two sites, RGS-FB-1 and RGS-FB-2, in the license). KSAT notes that the current license lists the geographic coordinates for the two sites as 64° 48' 47.4" N, 147° 44' 0.2" W (NAD-83) (elevation 134.0 m), at the GCI Communications Corp. facility at 1300 Van Horn Road, Fairbanks, AK 99701.

KSAT wishes to clarify that, while both antennas are located at the GCI Communications Corp. facility, the specific coordinates (NAD-83) for each antenna are as follows:

- RGS-FB-1 (ES 1): 64° 48' 47.4" N, 147° 43' 57.3" W (elevation 134.1 m)
- RGS-FB-2 (ES 2): 64° 48' 47.4" N, 147° 44' 0.2" W (elevation 133.99 m)

Two frequency coordination reports from COMSEARCH in Exhibit B refer to RGS-FB-1 (ES 1) as RGS-1 and RGS-FB-2 (ES 2) as RGS-2.

Remote Control

KSAT will operate the Station remotely from KSAT's Tromsø Network Operations Center (contacts below) consistent with Section 25.271 of the Commission's rules for operation of a transmitting earth station by remote control and as required by the Station license.

Contact Information

Stop Buzzer Contact (24/7 U.S. point of contact): KSAT Inc.

KSAT Inc. Operations can be reached 24/7 at 720-704-8456.¹⁴

¹³ See *supra* note 4 (2017 modification).

¹⁴ This information for KSAT Inc. is also provided in the Site Information Contact fields in Form 312, Schedule B, Items E2 and E6, of the 2025 Modification Application.

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KSAT has appointed its U.S. subsidiary, KSAT Inc., to serve as a 24 hours per day, 7 days per week point of contact in the United States. KSAT Inc. is a Delaware corporation with offices in Colorado staffed by U.S. citizens.

KSAT Inc. has been authorized by KSAT, the licensee, to cease operations at the Station in the event it is notified of harmful interference or is otherwise ordered to do so by the Commission. KSAT Inc. will cease operations at the Station by calling KSAT's 24/7 Tromsø Network Operation Center, which remotely operates the station.

KSAT's Tromsø Network Operations Center is available 24/7:¹⁵

Street address:

Prestvannveien 38
Tromsø 9011, Norway
Phone: (+47) 77 60 02 50 (KSAT main); (+47) 77 60 02 68 (24/7, direct for TNOC)
Email: tnoc-operator@ksat.no

Mailing address:

P.O. Box 6180 Langnes
9291 Tromsø, Norway

Site host for the Station:

GCI Communications Corp.
Combined Network Control Center
2550 Denali Street, Suite 1000
Anchorage, Alaska 99503
Phone: 1-855-770-3085 (24/7 Technical Support)
Email: cncc@gci.com / bts@gci.com

Applicant Legal and Technical Qualifications

KSAT, of Tromsø, Norway, operates a global network of ground stations for satellite TT&C and data acquisition and launch and early orbit phase services. KSAT is a commercial limited liability stock company, organized under the laws of Norway. KSAT is an existing Commission licensee.

¹⁵ This information for the KSAT TNOC remains the same as what KSAT provided in the Remote Control Point Location fields in Form 312, Schedule B, Items E61 to E68 for the current authorization and KSAT requests no changes.

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Public Interest

Grant of the STA to support operations with Planet’s Flock satellites pending grant of KSAT’s application to modify the Station license is in the public interest. Authorizing KSAT to support Planet’s Flock satellites with the Station will make Planet’s commercial remote sensing service more robust and efficient, which benefits the public and U.S. national security customers. For these reasons, we respectfully request that the Commission grant this STA.