

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

In the Matter of	)	
	)	
	)	
Heighliner Corp.	)	File No. SES-STA-_____
	)	
Application for Renewal of Special Temporary	)	
Authority	)	
	)	

APPLICATION FOR RENEWAL OF SPECIAL TEMPORARY AUTHORITY

Pursuant to Section 25.120 of the Federal Communication Commission’s (“Commission’s”) rules,¹ Heighliner Corp. (“Heighliner”), a wholly owned subsidiary of Astranis Space Technologies Corp. (“Astranis”), respectfully requests renewal of Special Temporary Authority (“STA”)² for a period of 180 days to support continued testing and operations with Astranis earth stations located near the following six locations: Clyde, Texas; Council Bluffs, Iowa; Falling Waters, West Virginia; Hanksville, Utah; Hartselle, Alabama; and San Francisco, California. All operations will be identical to those authorized under the previous 180-day STA, as set forth in the test plans and radiation hazard studies in Exhibits A–L, which are incorporated by reference herein.³ Heighliner has filed for permanent authority for these earth stations.⁴

I. FREQUENCIES AND POINTS OF COMMUNICATION

¹ 47 C.F.R. § 25.120.

² See Heighliner Corp., *Application for Extension of Special Temporary Authorization*, ICFS File No. SES-STA-20251210-01019 (granted Feb. 26, 2026) (“First 180-day STA”).

³ *Id.* at Exhibits A–L.

⁴ See Heighliner Corp., *Application for Modification of Authority to Operate Fixed Earth Stations* (E220162), ICFS File No. SES-MOD-20260417-01081 (filed May 4, 2026) (“License Modification”).

The earth stations will communicate with the Anuvu Alpha⁵ and Anuvu Bravo⁶ satellites (formerly named “AstranisAero West” and “AstranisAero East,” respectively) for testing, demonstrations and other necessary communications functions pending grant of permanent authority for these earth stations.⁷ These satellites, built by Astranis and launched on December 29, 2024, are collocated at the 83.1° W.L. orbital location and received U.S. market access authority on June 5, 2025.

All six earth stations will operate in the conventional and extended Ku-band frequencies,⁸ specifically 14–14.5 GHz (Earth-to-space) and 10.95–12.2 GHz (space-to-Earth), with specific frequency ranges detailed in each earth station’s respective test plan.⁹

II. WAIVER REQUEST

The Commission may waive any of its rules if there is “good cause” to do so.¹⁰ In general, waiver is appropriate if (1) special circumstances warrant a deviation from the general rule; and (2) such deviation would better serve the public interest than would strict adherence to

⁵ See Spacing Guild UK Limited, *Petition for Declaratory Ruling for the AstranisAero West Satellite To Service the U.S. Market and To Be Added to the Permitted Space Station List at the Nominal 83° W.L. Orbital Location in Ku-band Frequencies* (S3151), Grant Stamp, ICFS File Nos. SAT-PDR-20220823-00094 and SAT-APL-20241218-00286 (granted June 5, 2025) (“Anuvu Alpha Grant”).

⁶ See Spacing Guild UK Limited, *Petition for Declaratory Ruling for the AstranisAero East Satellite To Service the U.S. Market and To Be Added to the Permitted Space Station List at the Nominal 83° W.L. Orbital Location in Ku-band Frequencies* (S3150), Grant Stamp, ICFS File Nos. SAT-PDR-20220823-00093 and SAT-APL-20241218-00287 (granted June 5, 2025) (“Anuvu Bravo Grant”).

⁷ Heighliner has applied for permanent authority for these earth stations. See License Modification, *supra* note 4.

⁸ See 47 C.F.R. § 25.103 (The Commission defines “Conventional Ku-band” as the 11.7–12.2 GHz (space-to-Earth) and 14.0–14.5 GHz (Earth-to-space) FSS frequency bands. The Commission defines the “Extended Ku-band” as the 10.95–11.2 GHz (space-to-Earth), 11.45–11.7 GHz (space-to-Earth), and 13.75–14.0 GHz (Earth-to-space) FSS frequency bands.).

⁹ All six earth stations will transmit within the 14-14.5 GHz band, but certain earth stations will only receive within specific segments of the 10.95–12.2 GHz band. See First 180-day STA at Exhibits A–L, *supra* note 2.

¹⁰ 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).

the rule.¹¹ Generally, the Commission will grant a waiver of its rules in a particular case if the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest.¹²

Out of an abundance of caution, Heighliner requests a waiver of Footnote NG52 of the U.S. Table of Frequency Allocations to authorize operations in the 10.7–11.7 GHz frequency band. Footnote NG52 has long been understood as intending to limit constraints to deployment of terrestrial services in this spectrum. Good cause exists for the requested waiver because the Anuvu Alpha and Anuvu Bravo satellites are already authorized to downlink in the relevant sub-bands in the United States¹³ with earth stations in motion (“ESIMs”),¹⁴ and Heighliner is requesting a limited number (12) of fixed earth station antennas that will operate on a non-harmful, non-protected basis. As the Commission previously concluded in granting this waiver in the previous 180-day STA, earth stations operating in the band on a receive-only basis are not capable of causing interference to fixed stations operating in the same frequency band and thus do not undermine the intent of Footnote NG52.¹⁵

III. CONCLUSION

Grant of this STA renewal will serve the public interest, convenience, and necessity by enabling continued testing and operation of these six earth stations with the Anuvu Alpha and Bravo satellites pending final Commission action on the underlying permanent modification

¹¹ See *Northeast Cellular*, 897 F.2d at 1166.

¹² See *WAIT Radio*, 418 F.2d at 1157.

¹³ The Anuvu Alpha and Anuvu Bravo satellites have received market access grants to operate in the 10.95–11.2 GHz and 11.45–12.2 GHz bands in the United States. See Anuvu Alpha Grant, *supra* note 5; see also Anuvu Bravo Grant, *supra* note 6.

¹⁴ See Anuvu Alpha Grant, Condition 7; Anuvu Bravo Grant, Condition 7.

¹⁵ See First 180-day STA, *supra* note 2; see also Intelsat License LLC, *Application of Intelsat License LLC to Modify Authorization for Intelsat 905* (S2409), ICFS File No. SAT-MOD-20250117-00020 (granted Sept. 16, 2025).

application.¹⁶ Heighliner respectfully requests that the Commission grant renewal of its STA for 180 days following conclusion of the public notice period.¹⁷

Respectfully submitted,

/s/ Kailey D. Lauter

Kailey D. Lauter
Regulatory Associate

/s/ Kimberly M. Baum

Kimberly M. Baum
Head of Regulatory
Astranis
575 20th Street
San Francisco, CA 94107
202 286 6089

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¹⁶ See License Modification, *supra* note 4.

¹⁷ Heighliner's current 180-day STA expires on August 25, 2026. Heighliner timely files this application to ensure continued operating authority during the public notice period. See 47 C.F.R. § 1.62(a)(1); *see also* 47 C.F.R. § 25.120(a).