

**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: E220056
to Operate with Non-Geostationary Orbit	)	
Spacecraft	)	File No.: SES-MOD-20241203-02561
	)	

**REQUEST FOR 60-DAY SPECIAL TEMPORARY
AUTHORIZATION
(Deadhorse UHF Systems Antenna UHF Uplinks and 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 UHF earth station in Deadhorse, Alaska to conduct telemetry, tracking, and command (“TT&C”) and uplinks in portions of the 400 MHz band (Earth-to-space) and TT&C and payload downlink in the 402 MHz band (Space-to-Earth) to support the U.S.-licensed satellite known as Anduril-216¹, scheduled for launch in July 2026.

RBC Signals is awaiting a grant of amendment to its earth station application for this same ground system (E220056) 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 Anduril-216 while the longer-term license works through process. This system previously received an STA permission for this operation.

¹ See Anduril 0005-EX-ST-2026 via OET, Callsign WA9XOO (Granted April 4 2026)

²See RBC Signals, LLC, File No. SES-MOD-20241024-02561, Call Sign E220056 (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 historically provided similar ground station support for multiple spacecraft from this earth station with no resulting harmful interference³. 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 UHF Antenna in portions of the 402MHz (Earth-to-space) band and TT&C and payload downlink in portions of the 400 MHz band (Space-to-Earth) to support U.S.-licensed satellite operations, as described below.

A. Satellite Overview

Anduril-216 is an experimental mission designed to test a series of sensors, including long wave infrared, narrow and medium field of view electro-optical sensors and a mission data processor for the purpose of remote sensing and space object tracking. 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-20250225-00254, SES-STA-20260212-00852, SES-LIC-20220509-00467

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 KHz</i>	<i>Direction</i>
<i>Anduril-216</i>	<i>402.85</i>	<i>20</i>	<i>Earth to Space</i>
<i>Anduril-216</i>	<i>400.25</i>	<i>12</i>	<i>Space to Earth</i>

C. Frequency Allocations and Compatibility

a. TT&C Downlink – 400.15-401 MHz (space-to-Earth)

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 400.15-401 MHz band is shared between meteorological aids (Earth-to-space), mobile satellite (space-to-Earth), space research (space-to-Earth) and space operation services (space-to-Earth). RBC Signals seeks to perform TT&C downlink operations consistent with the co-primary space operations allocation in this band.⁶

RBC Signals seeks to perform TT&C downlink operations using the 400 MHz Yagi in the 400.15-401 MHz band (space-to-Earth; center frequency 400.5 MHz) consistent with the secondary allocation for space operations in this band. RBC Signals is not currently aware of any use of the subject frequency bands by incumbent operators near the Deadhorse, Alaska facility and will coordinate as needed to ensure its TT&C operations do not cause interference with primary mobile satellite or meteorological-aid services.

⁶ See 47 C.F.R. § 2.106 (defining “space operations” as “radiocommunication service concerned exclusively with the operation of spacecraft, in particularly space tracking, space telemetry, and space telecommand.”).

a. TT&C Uplink – 401-402 MHz band (Earth-to-space)

The Table of Allocations provides that “in the band 401-403 MHz, the non-federal Earth exploration-satellite (Earth-to-space) and meteorological-satellite (Earth-to-space) services are limited to earth stations transmitting to Federal space stations.”⁷ RBC Signals acknowledges that there are certain U.S. government meteorological aids and Earth exploration operations conducted in the 402-403 MHz band.⁸

⁷ 47 C.F.R. §2.106, fn. US384.

⁸ See https://www.ntia.doc.gov/files/ntia/publications/compendium/0402.00-0403.00_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 UHF antenna 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

The Commission may waive its rules for “good cause shown.”⁹ RBC Signals respectfully seeks a waiver of Section 2.106 of the Commission’s rules, 47 C.F.R. § 2.106, to the extent necessary to operate the 400 MHz Yagi and perform TT&C in the 401-402 MHz band using a 401.5 MHz center frequency. Good cause exists to grant a waiver in this case to permit RBC Signals to perform critical TT&C functions for the *Anduril-216* mission and this waiver would not undermine the purpose of the rules. The waiver is also consistent with the Commission precedent previously granting such a waiver to operate in this band in a previous satellite authorization.¹⁰ RBC Signals acknowledges that the authority to conduct earth station operations in this band is associated with a similar grant of the *Anduril-216 Application*.

The Table of Allocations provides that the 402-403 band is allocated on a primary basis to non-federal meteorological-aid services and on secondary basis to EESS (Earth-to-space). Moreover, “in the band 401-403 MHz, the non-federal Earth exploration-satellite (Earth-to-space) and meteorological-satellite (Earth-to-space) services are limited to earth stations transmitting to Federal space stations.”¹¹ Thus, RBC Signals seeks a waiver of this footnote to permit it to provide TT&C uplink support for the *Anduril-216* mission, which will facilitate the development and evaluation of an innovative U.S.-licensed satellite.

Acknowledging the connect between the *Anduril-216 Application* and this earth station application, a waiver is warranted here because it will provide RBC Signals with the ability to dependably provide critical satellite support for the *Anduril* mission.

⁹ See 47 C.F.R. §1.3 (“Any provision of the rules may be waived by the Commission on its own motion or petition if good cause therefor is shown.”).

¹⁰ See *Astro Digital U.S., Inc.*, File No. SAT-LOA-20170508-00071 (grant stamp Oct. 9, 2020) (the “*Astro Digital License*”), Condition 9.

¹¹ *Supra* n. 7.

Further, a waiver will serve the public interest as RBC Signals will support novel space technologies that bridge traditional launch deployment services. Finally, given the limited nature of the proposed operations and the coordination performed in support of the *Anduril-216 Application* to ensure the proposed operations will not cause harmful interference to co-frequency operations, grant of the waiver will not undermine the purposes of the rule. Thus, there is good cause to grant the requested waiver to permit the limited earth station operations proposed herein.

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 Anduril-216 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 UHF Antenna.

II. CONCLUSION

Based on the foregoing, RBC Signals respectfully requests that the Commission grant this 60-day STA to enable the Deadhorse UHF Antenna 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 Anduril-216 mission from its Deadhorse UHF Antenna in Deadhorse, Alaska Call Sign E220056

Antenna 1	
Antenna Description	M2 400CP30A
Antenna size	Yagi
Transmit Center Frequency	Summarized Below
Receive Center Frequency	N/A
Polarization	Right Hand Circular
Transmit Gain	16.2 dBi
Latitude (NAD83)	70°12'43.1"N
Longitude (NAD83)	148° 26' 13.7" W
Emission Bandwidths	Maximum EIRP Density per Carrier dBw/4kHz
20 kHz	4.26

Point of Communication	
Satellite	Anduril-216
Call Sign	WA9XOO
Satellite Type	NGSO
Orbit*	480-550 km; 97.5° inclination

