

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

Kongsberg Satellite Services AS (“KSAT”) respectfully requests an additional 180-day special temporary authorization¹ (“STA”) for its earth station in Fairbanks, Alaska (call sign E260377) (“Station”) in order to continue TT&C support for launch and early orbit-phase operations (“LEOPs”) of USPWSA-T1TL satellites supplied by Lockheed Martin Corporation (“Satellites”) to the U.S. Space Development Agency (“SDA”).

KSAT requests that the STA be granted for a 180-day term starting on October 28, 2026, which is the day immediately following the termination of the current 180-day STA,² and ending on April 25, 2027 in order for KSAT to continue its mission-critical LEOPs support for the Satellites.

The first plane of Satellites was launched on October 14, 2025. The launch for the second plane of Satellites may occur later this year.

KSAT provides LEOPs under contract to the Lockheed Martin Corporation (“LMC”), the prime contractor to SDA for the Satellites that are supported by the Station. The STA is needed for KSAT to support TT&C during LEOPs. The Satellites are part of SDA’s Tranche 1 Transport Layer program, which serve an important national security communications purpose. SDA will take delivery of the Satellites after commissioning.

On May 15, 2026, KSAT applied for a license to support both the commissioning (LEOPs) and operation of SDA’s satellites for the Tranche 1 Transport Layer and the Tranche 1 Tracking Layer programs, which would include supporting LEOPs and operation for LMC’s Satellites.³

Because the Satellites will be used and operated (after LEOPs) by the U.S. Government, the frequencies for their operation are coordinated through NTIA.

KSAT is told that the U.S. Government’s Advance Publication information⁴ submitted on November 15, 2023 covers the Station with the requested bandwidths and center frequencies.

Frequencies Requested

The following table lists the frequencies requested for this STA:

¹ 47 C.F.R. § 25.120.

² Application of Kongsberg Satellite Services AS for Special Temporary Authority for a Fairbanks, AK Earth Station, ICFS File No. SES-STA-20260226-00730 (granted Apr. 30, 2026 for a term of May 1, 2026 to Oct. 27, 2026).

³ Application of Kongsberg Satellite Services AS for a License for a Fairbanks, AK Earth Station, ICFS File No. SES-LIC-20260505-01248 (filed May 15, 2026).

⁴ Advance Publication Information for USPWSA-T1TL, ITU Submission Ref. No. USA2023-64624 (Nov. 15, 2023), <https://www.itu.int/ITU-R/space/asreceived/Publication/DisplayPublication/53644>.

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

Band	Use	Center Frequencies (MHz)	Polarization	Emission Designators
S-band	TT&C (Earth-to-space)	2048.6, 2048.7, 2048.8, 2049.0, 2049.2, 2049.4, 2049.5, 2049.6, 2049.7, 2049.8, 2050.0, 2050.2, 2050.4	RHCP	136KG1D, 146KG1D
S-band	TT&C (space-to-Earth)	2223.45, 2223.70, 2223.95, 2224.45, 2224.95, 2225.45, 2225.70, 2225.95, 2226.20, 2226.45, 2226.95, 2227.45, 2227.95	RHCP	127KG1D, 139KG1D, 250KG1D

KSAT requests authorization for the frequencies in the table above in accordance with the NTIA coordination. These are the same center frequencies and bandwidths authorized for the current STA.

The point of contact for frequency coordination at SDA will be provided in a separate email to the Commission.

KSAT will operate the Station on a non-interference basis. KSAT has coordinated the Station transmissions with other local users and the local Society of Broadcast Engineers, Inc. frequency coordinator. KSAT is submitting a frequency coordination report as **Exhibit B**.

Station Specifications

The Station uses a 5.0 meter antenna from Orbital Systems. The Station is hosted at the Vantor-RGTAK site in Fairbanks, Alaska. The specifications for the Station are as follows:

Site Address: 699 Wayne Williams Lane, Fairbanks, AK 99712
Site Coordinates: 64° 53' 26.53" N, 147° 31' 42.96" W (NAD-83)
Site Elevation (AMSL): 218 meters

5.0m S-band Antenna:

Name: FB4
Make/Model/Diameter of Antennas: Orbital Systems, 5.0EA3BP, 5.0 m diameter
Antenna Height Above Ground Level: 9.9 meters
Antenna Height Above Sea Level: 228.1 meters
Antenna Size: 5.0 meter diameter
Total Input Power at Antenna Flange: 25.12 watts (max.)

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Antenna Gain Transmit and/or Receive: 37.6 dBi at 2075 MHz

Total EIRP for all carriers (dBW): 51.6 dBW (max.)

Antenna Azimuth Angle Western Limit / Eastern Limit: 0° / 360° (for all frequencies)

Antenna Elevation Angle Western Limit / Eastern Limit: 5° / 5° (for all frequencies)

Maximum EIRP Density per Carrier (dBW/4kHz)⁵: 36.3 (at 136 kHz), 35.98 (at 146 kHz)

Maximum EIRP Density toward the Horizon (dBW/4kHz): 7.58 (at 136 kHz), 7.27 (at 146 kHz)

The Station is remotely operated and controlled from KSAT's Tromsø Network Operations Center in Tromsø, Norway, which can be reached 24/7 at (+47) 77 60 02 68. KSAT Inc., a U.S. entity, can be reached 24/7 at +1 (720) 704-8456 (stop buzzer).⁶ KSAT meets the conditions listed in Section 25.271 of the Commission's rules for operation of a transmitting earth station by remote control.

A radiation hazard report is attached as **Exhibit C** (for reference, this is the same Exhibit C that has been filed with the license application for the Station⁷).

The Station operates with the Satellites on a bent-pipe basis. Commands for the Satellites are created by LMC and are sent encrypted to KSAT's earth station for transmission to the Satellites. Telemetry is received at the Station from the Satellites in encrypted form and transmitted to LMC.

The first plane of 21 Satellites, which were launched on October 14, 2025, are being supported under the current STA. The launch of the second may also occur within the requested 180-day STA period.

The Satellites are in a 995.26 km circular non-geostationary orbit, inclined at 81.28 degrees.

⁵ These values are the worst-case for operation of the Station with the LMC Satellites. The overall T1TL constellation's worst-case EIRP Density from the Comsearch report (Exhibit B) is 36.3 dBW/4 kHz. As stated in the Comsearch report, the Horizon Gain is 8.89 dBi for both 136 kHz and 146 kHz.

⁶ KSAT has appointed its U.S. subsidiary, KSAT Inc., to serve as a 24 hours per day, 7 days per week U.S. point of contact. KSAT Inc. is a Delaware corporation with offices in Colorado staffed by U.S. citizens. KSAT Inc. has been authorized by KSAT 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.

⁷ See *supra* note 3 (Exhibit C filed on June 22, 2026).

Waiver Request

KSAT requests a waiver for the planned S-band operations to the extent the planned use does not conform to the U.S. Table of Frequency Allocations.⁸ The Commission may grant a waiver of its rules for good cause shown.⁹

The frequencies in the table above, which fall within the 2025-2110 MHz and 2200-2290 MHz segments of the S-band, are allocated for the Space Operations Service (Earth-to-space and space-to-Earth, respectively) for Federal users only.¹⁰

The use of the requested frequencies by KSAT to provide LEOPs for the Satellites is in the public interest, as demonstrated below. The risk of harmful interference is *de minimis* because the transmit frequencies for the Station have been coordinated through COMSEARCH and the operations are coordinated with SDA. For these reasons, there is good cause for the Commission to grant a waiver for the requested operations to the extent needed.

Public Interest

Grant of this STA request will serve the public interest in accordance with Section 25.120(b)(1) of the Commission's rules. The Satellites are part of SDA's Tranche 1 Transport Layer program and will be delivered to SDA after commissioning. Without the continued LEOPs support from the Station, the commissioning of the Satellites will be hampered to the detriment of U.S. national security interests. For these reasons, we respectfully request that the Commission grant this STA for a 180-day term starting on October 28, 2026.

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.

⁸ 47 C.F.R. § 2.106.

⁹ 47 C.F.R. § 1.3.

¹⁰ See 47 C.F.R. § 2.106. KSAT notes that footnote US347 does not apply: the footnote allows for authorization of non-Federal Earth-to-space transmissions in the space research and Earth exploration-satellite services subject to such conditions as may be applied on a case-by-case basis.

Antenna Notification Requirement

KSAT affirms that prior FAA notification is not required for the earth station. KSAT's S-band antenna stands 9.9 meters (max.) above ground level. Fort Wainwright, which has an active airfield, is approximately 4 miles away (over 21,000 feet from the nearest point of the nearest runway). Prior FAA notification of the S-band antenna is not required because the antenna is shielded from the nearest airfield by topographic features that are greater in height: a ridge that varies between 213 and 244 meters in elevation lies between the earth station site (218 meters AMSL) and the airfield at Fort Wainwright (137 meters). Furthermore, there is an existing antenna structure operated by Vantor at the site that is approximately 228.1 meters in height above sea level, the same as the S-band antenna.