

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

In the Matter of)
)
Skybox Imaging, Inc.) File No. SAT-LOA-20120322-00058
) Call Sign: S2862
Authorization to Launch and Operate a)
Remote-Sensing Satellite System)
)
To: Chief, International Bureau

**REQUEST OF SKYBOX IMAGING, INC. FOR DETERMINATION OF
COMPLIANCE WITH SATELLITE IMPLEMENTATION MILESTONES**

Skybox Imaging, Inc. (“Skybox”), by counsel and pursuant to Section 25.164 of the Commission’s Rules, hereby notifies the Commission that it has met the first three milestones set forth in the authorization released on September 20, 2012.¹ In the *Skybox Grant*, the Commission granted Skybox authority to construct, launch, and operate a non-geostationary-orbit (“NGSO”) satellite system consisting of two Earth Exploration Satellite Service (“EESS”) spacecraft – SkySat-1 and SkySat-2 – that will operate in the 8025-8400 MHz frequency bands. The SkySat satellites will receive command signals on center frequencies of 2081 MHz and 2083 MHz.

In this Request, Skybox demonstrates that it: (i) has entered into binding, non-contingent arrangements for the construction of the two SkySat satellites authorized in the *Skybox Grant*; (ii) has completed Critical Design Review of SkySat-1 and SkySat-2; and (iii) has commenced physical construction of both authorized satellites. As a result of these showings, Skybox respectfully requests that the International Bureau expeditiously determine that Skybox has satisfied the first three milestone requirements that were imposed in the *Skybox Grant*. The

¹ *Skybox Imaging, Inc.*, Stamp Grant in File No. SAT-LOA-20120322-00058 (released September 20, 2012), as Corrected on October 3, 2012 (“*Skybox Grant*”).

determination that Skybox has satisfied the first three satellite system implementation milestones will allow Skybox to reduce the amount of the \$5 million bond that it filed within the required 30 days of the date of the authorization to \$2 million. *See* 47 C.F.R. § 25.165(d).² Skybox seeks the prompt issuance by the Commission of a public notice authorizing this bond reduction.

Executive Summary

The Bureau granted Skybox’s NGSO EESS system application on September 20, 2012 in the *Skybox Grant*. Paragraph 6 of the Attachment to Grant required Skybox to meet five satellite implementation milestones, as follows:

- Enter into a binding non-contingent contract to construct the licensed satellite system by September 20, 2013;
- Complete the Critical Design Review of the licensed satellite system by September 20, 2014;
- Begin construction of the first satellite by March 20, 2015;
- Launch and begin operation of the first satellite by March 20, 2016;
- Bring the second satellite into operation by September 20, 2018.

See Skybox Grant, Attachment to Grant at 1-2. In addition, Paragraph 7 of the Attachment to Grant also mandated that Skybox file a \$5 million bond with the Commission within 30 days of the September 20, 2012 grant date pursuant to procedures established by the Commission. *Id.* at 2. Skybox timely filed the required \$5 million bond on October 19, 2012.

Under the Commission’s Rules, an NGSO licensee may reduce the amount of its bond by \$1 million upon successfully meeting a milestone deadline set forth in Section 25.164 of the Rules. *See* 47 C.F.R. §25.165(d). The Commission’s procedures provide that licensees will be permitted to file a new bond at a lower amount only after the International Bureau announces that

² Skybox is filing two versions of this request, one via the International Bureau Filing System (“IBFS”) Milestone Module with the attachments redacted, including multiple contractual documents, the company’s critical design review materials for SkySat-1 and SkySat-2, and other confidential and proprietary information. The unredacted version of the request, with complete attachments, is being submitted contemporaneously pursuant to a request for confidential treatment via the IBFS Pleadings and Comments Section. It is Skybox’ understanding that post-grant confidential documents may only be submitted electronically through the IBFS Pleadings and Comments Section.

the licensee has met the milestone(s). See FCC Public Notice, Report No. SPB-187, DA 03-2602, 18 FCC Rcd 16283 (2003).

Skybox’s progress toward implementing its authority for its two-satellite NGSO EESS system has already reached the first three milestone points contained in the *Skybox Grant*. A summary of the status of Skybox’s compliance with these implementation milestones set forth in Section 25.164(b) is provided here for convenience:

FCC Rule	Milestone	Milestone Deadline per Skybox Grant Order	Date on Which the Milestone was Satisfied	Evidence of Completion
25.164(b)(1)	Entry into a Binding, Non-Contingent Contract	September 20, 2013	Multiple, from April 2010 to March 2012	Agreements with L3 Communications, Integrated Optical Systems (“L3IOS”) for construction and delivery of two satellite payloads; Agreement with Microsat Systems Canada, Inc. for two satellites’ reaction wheels; Memorandum of Understanding with Sinclair Interplanetary for two satellites’ star trackers (two per satellite) and torque rods (three per satellite); Agreement with SpaceQuest, Ltd for SkySat-1 solar array; Agreement with SpaceQuest, Ltd. For SkySat-2 solar array; Agreements with Triple Ring Technologies (“TRT”) for cameras for SkySat-1 and SkySat-2; Agreements with NASA Ames Research Center for thermal vacuum testing for SkySat-1 and SkySat-2; Skybox Imaging lease agreement for integration facility (including manufacturing, testing, and clean room components); Declaration of James G. McClelland, Skybox Imaging Vice President for Mission Assurance, describing Skybox component construction and self-integration arrangements for SkySat-1 and SkySat-2 satellites (with annexes)
25.164(b)(2)	Completion of Critical Design Review	September 20, 2014	February 14-17, 2011	SkyBox Imaging CDR Package (on CD-ROM); Declaration of James G. McClelland, Skybox Imaging Vice President for Mission Assurance

FCC Rule	Milestone	Milestone Deadline per Skybox Grant Order	Date on Which the Milestone was Satisfied	Evidence of Completion
25.164(b)(3)	Commencement of Physical Construction	March 20, 2015	Fourth Quarter 2010	Declaration of James G. McClelland, Skybox Imaging Vice President for Mission Assurance; Photographs of SkySat-1 and SkySat-2 in Skybox Imaging manufacturing/integration facility

Each element summarized above is discussed below in detail, and each document referenced is fully identified.

Accordingly, Skybox is filing this notification pursuant to Sections 25.164(c), (d) and (e) of the Commission’s Rules to report its completion of these three requirements. In addition, because satisfaction of these requirements permits it to reduce the amount of the bond filed with the Commission,³ it is requesting that the Commission review this submission and issue a determination that Skybox has met its first three implementation milestones, allowing it to reduce the amount of its performance bond to \$2 million, commensurate with the progress made to date in bringing its authorized system into service. Appropriate showings regarding each of the three milestones are provided below.

Milestone 1 – Entry into a Binding, Non-Contingent Construction Contract – Satisfied Various Dates from April 2010 to March 2012

The initial contracting milestone requires that the licensee enter into a binding, non-contingent contract for construction of the authorized facility. *See Amendment of the Commission’s Space Station Licensing Rules and Policies*, 18 FCC Rcd 10760, 10831 (¶ 184) (2003) (“*SSLR Order*”); 47 C.F.R. § 25.163(b)(1).

³ See *Skybox Grant*, Attachment to Grant at 2; 47 C.F.R. § 25.165(d).

Skybox did not enter into a single agreement with an independent satellite manufacturer for the construction of the two SkySat satellites. Instead, Skybox entered into a series of contractual agreements with different suppliers for the main components of the spacecraft (including payload, solar panels, reaction wheels and star trackers, and the cameras), and established its own manufacturing, testing, and clean-room facility for the integration of the SkySat-1 and SkySat-2 satellites. These arrangements date back to 2010, and all of the outsourced major components have been completed as per the contractual arrangements. Indeed, SkySat-1 is fully complete in advance of a launch initially scheduled for Fall 2012 but now delayed until August 2013, and SkySat-2 is in the late stages of satellite construction at the Skybox integration facility.⁴ As of January 31, 2013, SkyBox has paid almost ██████████ of the ██████████ it budgeted for the construction of the two authorized SkySat satellites, or more than ██████ of the total cost. Declaration of James G. McClelland, Skybox's Vice President for Mission Assurance ("McClelland Declaration") at ¶ 8.⁵ Outsourced components and systems account for ██████ ██████ ██████████ of the satellites' total construction budget. With the exception of the payload contract, all outsourced components and subsystems of the two satellites have been paid for in full. *Id.* To date, SkyBox has also paid ██████████ of the ██████████ to L3IOS for the payloads, and the final payment of ██████████ is scheduled under the contract to be made in ██████. *Id.* In addition, SkyBox has paid approximately ██████████ to Microsat Systems for reaction wheels; approximately ██████████ to Sinclair Interplanetary for star trackers and torque rods; approximately ██████████

⁴ Skybox has entered into an agreement for the launch of SkySat-2 as well. Under the agreement, SkySat-2 is due to be launched at a date to be determined during the Third Quarter of 2013.

⁵ The McClelland Declaration is included as Attachment H to this Request.

to SpaceQuest for the solar panels; and approximately [REDACTED] to TRT for the satellites' cameras.⁶

Much of the remaining [REDACTED] in costs for construction of SkySat-1 and SkySat-2 are for the manufacturing and integration of SkySat-1 and SkySat-2 that Skybox was to perform at its own facility in Mountain View, California. Through the end of 2012, Skybox has paid [REDACTED] of these projected costs. McClelland Declaration, at ¶ 8. Skybox includes here the lease agreement it has showing that it possesses the right to use the manufacturing facilities where the final assembly of the SkySat-1 and SkySat-2 satellites has taken place (or is now taking place in the case of SkySat-2).⁷ In addition, Skybox includes the agreement it has with NASA Ames Research Center for vacuum testing of the spacecraft. Detailed technical specifications for the satellites is included with the critical design review package discussed in connection with the second milestone below, as well as with various of the agreements.⁸

Skybox's manufacturing/integration approach is explained in the McClelland Declaration. McClelland Declaration, at ¶ 6. Mr. McClelland confirms that Skybox authorized the full construction of the two SkySat satellites in July 2010 with a view to completion and launch of the two-satellite constellation by the Third Quarter of 2013; committed to the purchase of all necessary outsourced components and services (representing more than [REDACTED] of the total cost of the two spacecraft), with all but the final [REDACTED] due to the payload supplier having now been paid in full; has in fact received all of the components for both SkySat-1 and SkySat-2 at its

⁶ Included as Attachments to this Request are the L3IOS materials (Attachments A1 and A2), the Microsat Systems materials (Attachments B1 and B2), the Sinclair Interplanetary materials (Attachments C1 through C4), the SpaceQuest materials (Attachments D1 and D2), and the TRT materials (Attachment E). The final payment to L3IOS is scheduled to be made by Skybox before the end of February 2013.

⁷ The lease agreement is included as Attachment F to this Request.

⁸ The NASA Ames Research Center agreement is included as Attachment G to this Request.

manufacturing facility in Mountain View, California; and that the SkySat-1 satellite is complete and awaiting shipment to the launch facility in Ukraine, and SkySat-2 is currently being integrated at Skybox's manufacturing and integration facility in Mountain View, California.

Skybox has assembled an extremely qualified team of managers, engineers, and technical advisors to guide the company through the process of designing and manufacturing the SkySat-1 and SkySat-2 satellites. Attachment J to this Request contains the biographies of the staff with relevant design and manufacturing expertise that Skybox has assembled to design and manufacture the two authorized satellites.

The materials supplied here by Skybox collectively satisfy the Commission's contract milestone. The Commission does not construe the obligation to enter into a binding, non-contingent satellite manufacturing contract as requiring the execution of an arm's-length agreement with an independent satellite maker, as such a requirement would bar licensees from relying on an in-house satellite-manufacturing capability. Instead, the Commission permits licensees to demonstrate their commitment to implementation of the authorized satellite system in other ways, and thereby allow realization of the efficiencies achievable through vertical integration of satellite construction and operation.⁹ Importantly, in assessing compliance of the first milestone by a self-manufacturing licensee, the Commission looks at factors that include whether the work since the issuance of the internal work determination has progressed in accordance with the formal work schedule.¹⁰ Not only was the go-head order given well before

⁹ See, e.g., *The Boeing Company*, 18 FCC Rcd 12317, 12328-29 (Int'l. Bur. and OET, 2003) (setting forth the evidentiary elements a self-manufacturing licensee may rely upon to meet the first implementation milestone).

¹⁰ *Id.* at 12329.

Skybox even applied to the Commission for its two-satellite system license,¹¹ Skybox has nearly completed its work schedule for the SkySat-1 and SkySat-2 spacecraft, and both satellites are now on schedule to be placed into operation in a matter of months – and fully five years ahead of the final milestone established in the *Skybox Grant*.

Milestone 2 – Completion of Critical Design Review – Satisfied February 2011

The Commission has not prescribed a particular method or standard for determining satisfaction of the second implementation milestone, the completion of Critical Design Review (“CDR”). It has, however, identified this stage as the point in “the spacecraft implementation process at which the design and development phase ends and the manufacturing stage starts.” *See SSLR Order*, 18 FCC Rcd at 10833 (¶ 191). It has suggested that proof of a large payment of money, often coincident with the completion of CDR; affidavits from an independent manufacturer; and evidence that all long lead items needed to begin physical construction of the spacecraft could provide demonstration that this milestone has been satisfied. *Id.*¹²

CDR for the first phase of the Skybox implementation plan or “SkySat-1” – covering both SkySat satellites from the *Skybox Grant* – was successfully completed over the course of several days in February 2011. A compact disc containing the full CDR package for the two-satellite SkySat-1 program is attached hereto as Attachment I. *See also* McClelland Declaration, at ¶ 5.

¹¹ *See* Skybox Imaging Board of Directors Meeting, July 20, 2010, at 14 (Series B Budget) and 22 (Engineering Strategic Roadmap, including satellite construction and launch milestones). A copy of this document is included as Annex 1 of the McClelland Declaration, which is Attachment H to this Request.

¹² In a March 2004 Public Notice the Commission indicated that it could look to any or all of the following information in conjunction with its review of a CDR milestone submission: 1) the documentation package prepared for payload subsystem CDR and the resulting CDR Report and Actions Items list (preferably on CD-ROM, but paper is acceptable); 2) Evidence of payment up through the date of CDR, either through copies of cancelled checks or a letter signed by the authorized entity certifying payment and the amount and dates of those payments; and 3) any revisions to the satellite manufacturing contract, whether modified, amended, or rescinded and replaced, or that reflect contractual arrangements in any way different from the contract previously submitted to the Commission to show compliance with the milestone for entering into a satellite manufacturing agreement. Public Notice Report No. SPB-204, *The International Bureau Provides Guidance Concerning the Critical Design Review Milestone Requirement*, DA 04-787 (released March 25, 2004).

Mr. McClelland states that SkyBox has paid nearly [REDACTED] budgeted for construction of both SkySat satellites (or over [REDACTED] of the total construction cost for the two satellites) and all contracted for components and services have been delivered to Skybox's manufacturing facility or performed as agreed. This evidence, coupled with the fact that the SkySat-1 is fully constructed and being prepared for shipment to the launch facility, and that SkySat-2 is now in the advanced stages of construction and assembly (*see* discussion of Milestone 3, below) demonstrates unequivocally that Skybox has satisfied the CDR milestone.

Milestone 3 – Commencement of Physical Construction – Satisfied 2010

As with the CDR milestone, the Commission has established no specific guidelines for determining satisfaction of the third implementation milestone, commencement of physical construction. Instead, it has stated that licensees are required “to provide sufficient information to demonstrate to a reasonable person that they have commenced physical construction of their licensed spacecraft.” *SSLR Order*, 18 FCC Rcd at 10834 (¶ 193).

SkySat-1 is fully constructed and in preparation for shipment to the launch facility in Ukraine. *See* McClelland Declaration, at ¶ 6. SkySat-2 is currently undergoing component integration at Skybox's manufacturing and integration facility in Mountain View, California. *Id.* at ¶ 7. Annex 2 to the McClelland Declaration contains photographs of the completed SkySat-1 spacecraft, and the SkySat-2 satellite currently under construction. Physical construction of the two-satellite system commenced within a few months after September 2010, when work began under timetables established in Skybox's contracts with L3IOS for the payloads, Microsat Systems for reaction wheels, and SpaceQuest for the SkySat-1 solar panels.¹³ All of the contracted components were subsequently delivered to Skybox in 2011 and 2012. McClelland Declaration,

¹³ *See* Attachments A, B, and D to this Request (calling for commencement of performance by the component contractors at various dates within a few months of September 2010).

at ¶ 6. Vacuum testing of SkySat-1 at NASA Ames Research Center has been completed. *Id.* at ¶ 8.

These facts and supporting materials are more than sufficient to demonstrate that physical construction of the authorized Skybox system has commenced.

Request for Determination of Milestone Compliance

Skybox has submitted the foregoing information in compliance with Sections 25.164(c), (d) & (e) of the Commission’s Rules governing milestone compliance. This information demonstrates that the first three implementation milestones set forth in the *Skybox Grant* have already been met. The Commission’s Rules provide that NGSO licensees “will be permitted to reduce the amount of the bond by \$1 million upon successfully meeting a milestone deadline set forth in section 25.164(b) of this chapter.” 47 C.F.R. § 25.165(d). Inasmuch as Skybox has demonstrated herein that it has completed the initial three implementation milestones to which it is subject, it respectfully requests that the Commission affirm this fact, allowing it to reduce the amount of its bond to \$2 million.

* * * * *

Should there be any questions regarding the foregoing information, please contact the undersigned counsel.

Respectfully submitted,
SKYBOX IMAGING, INC.

By: *s/ Stephen D. Baruch*
Stephen D. Baruch
David S. Keir

Lerman Senter PLLC
2000 K Street, N.W., Suite 600
Washington, D.C. 20006
(202) 429-8970

March 4, 2013

Its Attorneys

**List of Attachments
REDACTED (Except as Noted)**

Attachment A1	L3 Communications IOS Payload – Statement of Work
Attachment A2	L3 Communications IOS Payload – Requirements Specification
Attachment B1	Microsat Systems Canada, Inc. Purchase Order and Supply Agreement for Reaction Wheels (9/24/2010)
Attachment B2	Microsat Systems Canada, Inc. Purchase Order and Supply Agreement for Reaction Wheels (10/04/2012)
Attachment C1	Sinclair Interplanetary Purchase Order and Supply Agreement for Star Tracker, Torque Rod (9/24/10)
Attachment C2	Sinclair Interplanetary Purchase Order and Supply Agreement for Star Tracker, Torque Rod (2/09/2012)
Attachment C3	Sinclair Interplanetary Purchase Order and Supply Agreement for Reaction Wheels (1/06/2012)
Attachment C4	Sinclair Interplanetary Purchase Order and Supply Agreement for Reaction Wheels (2/02/2012)
Attachment D1	SpaceQuest, Ltd. Purchase Order and Supply Agreement – SkySat-1 (9/14/2010)
Attachment D2	SpaceQuest, Ltd. Purchase Order and Supply Agreement – SkySat-2 (1/11/2012)
Attachment E	Triple Ring Technologies, Inc. Professional Services Agreement
Attachment F	Commercial Real Estate Lease Agreement for Manufacturing and Assembly Facility
Attachment G	Space Act Agreement with NASA Ames Research Center for Thermal Vacuum Testing
Attachment H	Declaration of James G. McClelland, Vice President for Mission Assurance, Skybox Imaging (February 25, 2013) **Partially Redacted**
Attachment I	Critical Design Review Package for two-satellite SkySat-1 program (15 Documents)
Attachment J	Biographies of Skybox Imaging staff with design and manufacturing expertise

Attachment A1

L3 Communications IOS Payload – Statement of Work

REDACTED

Attachment A2

L3 Communications IOS Payload – Requirements Specification

REDACTED

Attachment B1

Microsat Systems Canada, Inc. Purchase Order and Supply
Agreement for Reaction Wheels (9/24/2010)

REDACTED

Attachment B2

Microsat Systems Canada, Inc. Purchase Order and Supply
Agreement for Reaction Wheels (10/04/2012)

REDACTED

Attachment C1

Sinclair Interplanetary Purchase Order and Supply Agreement
for Star Tracker, Torque Rod (9/24/10)

REDACTED

Attachment C2

Sinclair Interplanetary Purchase Order and Supply Agreement
for Star Tracker, Torque Rod (2/09/2012)

REDACTED

Attachment C3

Sinclair Interplanetary Purchase Order and Supply Agreement
for Reaction Wheels (1/06/2012)

REDACTED

Attachment C4

Sinclair Interplanetary Purchase Order and Supply Agreement
for Reaction Wheels (2/02/2012)

REDACTED

Attachment D1

SpaceQuest, Ltd. Purchase Order and Supply Agreement –
SkySat-1 (9/14/2010)

REDACTED

Attachment D2

SpaceQuest, Ltd. Purchase Order and Supply Agreement –
SkySat-2 (1/11/2012)

REDACTED

Attachment E

Triple Ring Technologies, Inc. Professional Services Agreement

REDACTED

Attachment F

Commercial Real Estate Lease Agreement
for Manufacturing and Assembly Facility

REDACTED

Attachment G

Space Act Agreement with NASA Ames Research Center for
Thermal Vacuum Testing

REDACTED

Attachment H

Declaration of James G. McClelland, Vice President for Mission Assurance, Skybox Imaging, dated February 25, 2013*

* Partially redacted

DECLARATION OF JAMES G. McCLELLAND

I, James G. McClelland, hereby declare under penalty of perjury that the following statements are true and correct to the best of my belief:

1. That I am the Vice President for Mission Assurance of Skybox Imaging, Inc. (“Skybox”), which is authorized by the Federal Communications Commission (“Commission”) to establish a two-satellite nongeostationary-satellite orbit (“NGSO”) system that will operate in the Earth Exploration Satellite Service (“EESS”).
2. Skybox is serving as the manufacturer of its SkySat-1 and SkySat-2 satellites. It has established a manufacturing and integration facility at its headquarters in Mountain View, California. This facility includes manufacturing space, testing space, and a clean room for assembly.
3. On July 20, 2010, Skybox’s Board of Directors authorized the construction of the SkySat-1 and SkySat-2 satellites. The total authorized cost of the two-satellite program was ██████████, and SkySat-1 was to be completed in time for an August 2012 launch, with SkySat-2 to be completed in time for an anticipated launch in 2013. A copy of the budget and construction and launch milestones ratified at that time is included in the document that is Annex 1 to this Declaration (see pages 14 and 22).
4. Of the total cost of the satellites, ██████████ was for major components and subsystems that were procured from outside sources. These components and subsystems include the satellites’ payloads, reaction wheels, solar panels, cameras, star trackers, and torque rods. Much of the remaining ██████████ in budgeted construction costs for SkySat-1 and SkySat-2 was for Skybox’s manufacturing and integration expenses.
5. The two identical SkySat satellites underwent their critical design review (“CDR”) from February 14-17, 2011. As of that point in time, Skybox had paid approximately ██████████ of the total purchase price for the two satellites.
6. It is difficult to pinpoint an exact date on which physical construction of the SkySat satellites commenced. Under component and subsystem contracts entered into in September 2010, fabrication by the suppliers of dedicated components for SkySat-1 is believed to have commenced during the fourth quarter of 2010. Manufacture of the SkySat-1 satellite bus at Skybox’s facility commenced in September 2011. Outsourced components and subsystems for Skybox-1 were delivered during 2011 and into 2012, and assembly of SkySat-1 was fully completed by October 2012. The completed satellite has been subjected to two rounds of vacuum testing at NASA’s Ames Research Center facility, and is currently being readied for shipment to the launch site in Ukraine. A photograph of SkySat-1, from September 2012, during integration testing at Skybox’s facility is included in Annex 2 to this Declaration.

7. SkySat-2 is now under assembly at Skybox's manufacturing and integration facility. A photograph of SkySat-2, from January 2013, during assembly at Skybox's facility is included in Annex 2 to this Declaration.
8. As of January 31, 2013, Skybox has paid in full [REDACTED] for the construction of the two authorized SkySat satellites – or more than [REDACTED] of the total cost. With the exception of the payload contract, all outsourced components and subsystems of the two satellites, have been paid for in full. To date, Skybox has paid [REDACTED] of the [REDACTED] contract price to L3 Communications Integrated Optical Systems, and the final payment of [REDACTED] is scheduled under the contract to be made in [REDACTED]. Through the end of 2012, Skybox has also paid [REDACTED] it budgeted for self-integration costs at its Mountain View, California manufacturing and integration facility.
9. As of January 31, 2013, Skybox has paid [REDACTED] cost for the launch of SkySat-1.
10. Skybox has entered into an agreement with Glavkosmos to launch SkySat-2 in the 3rd quarter of 2013.
11. All statements of fact in the foregoing Request for Determination of Compliance with Satellite Implementation Milestones are true and correct to the best of my belief.

By: *s/ James G. McClelland*
James G. McClelland
VP, Mission Assurance

Dated: February 25, 2013

Copy of Presentation Materials for

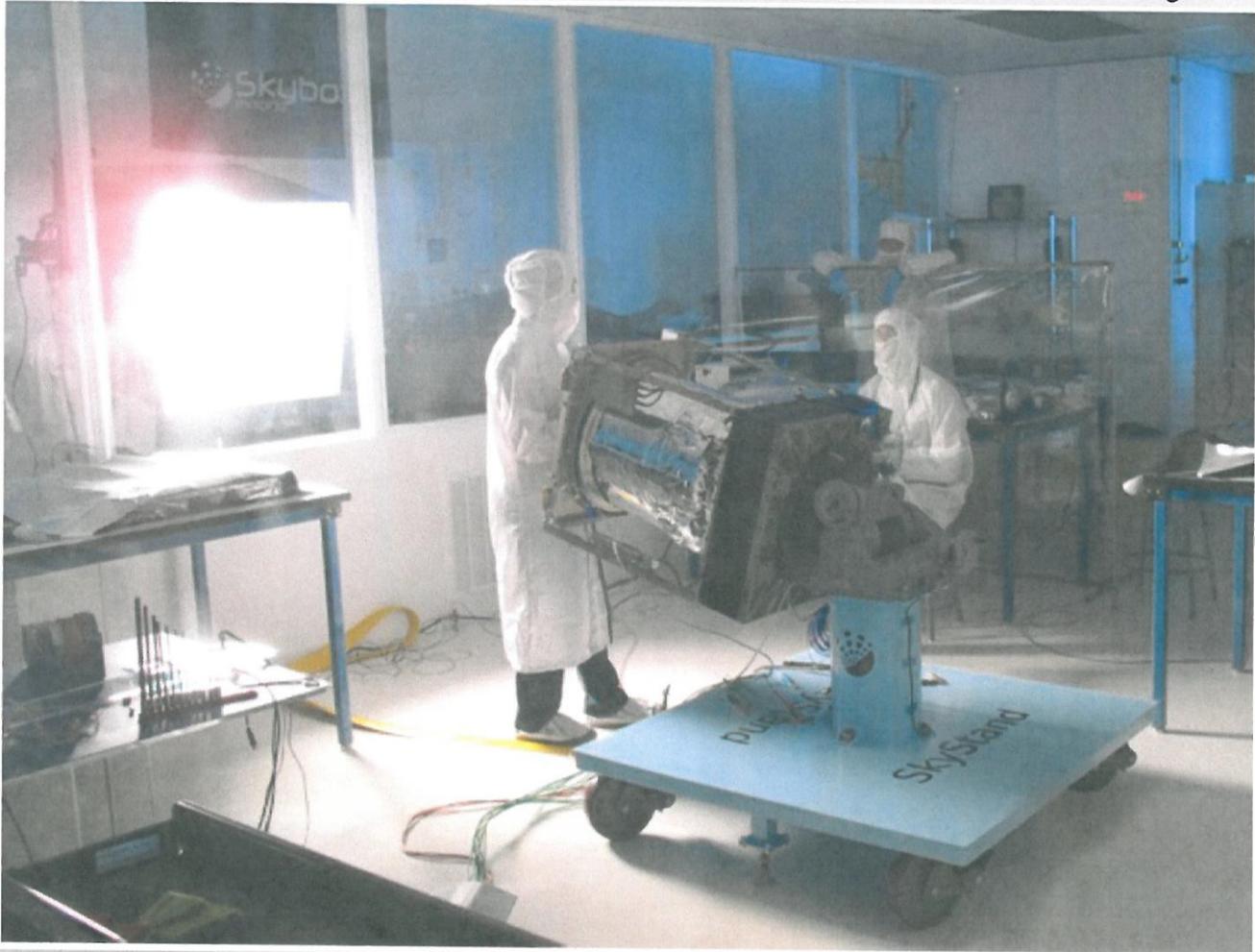
Skybox Imaging

Board of Directors Meeting

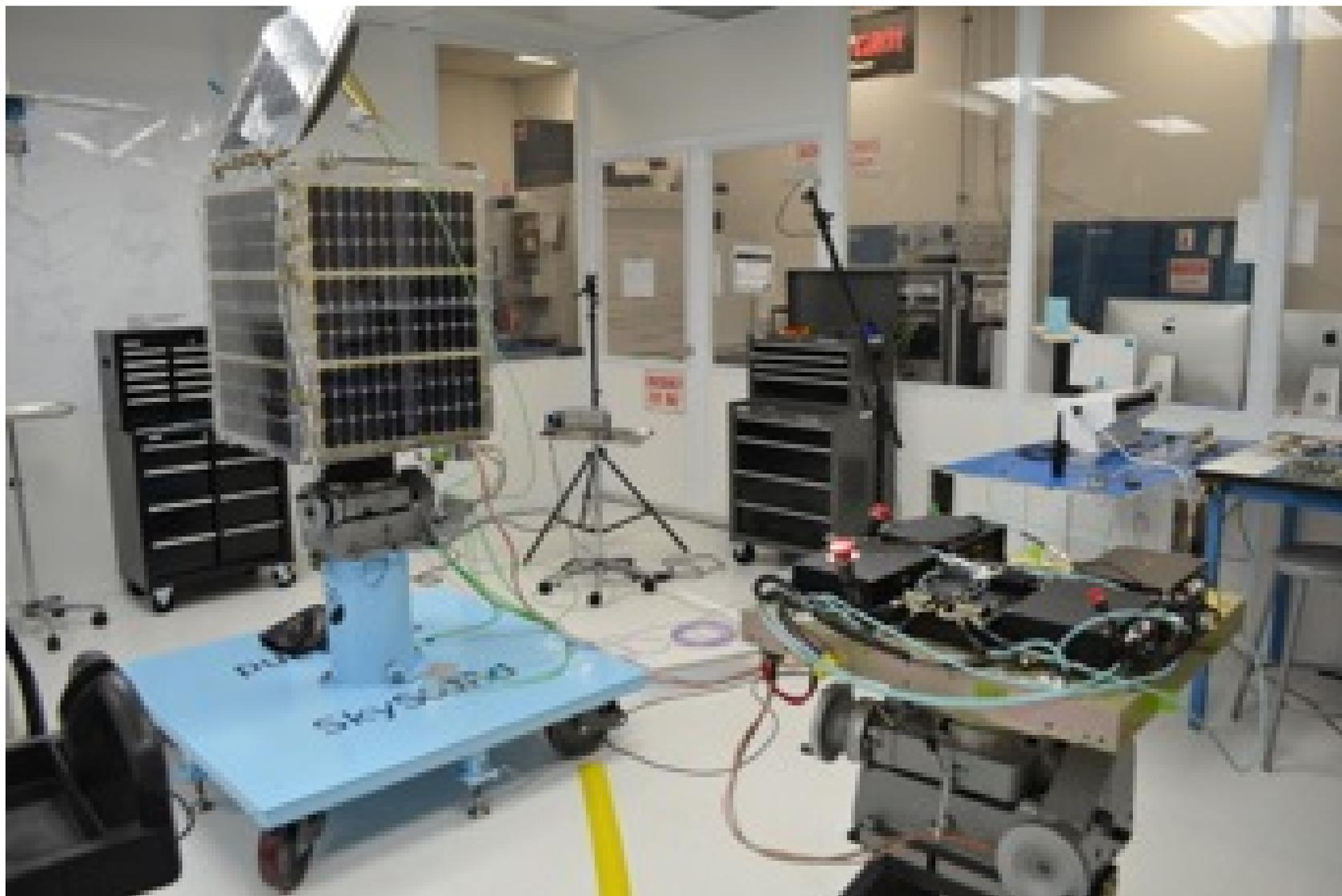
July 20, 2010

REDACTED

SkySat-1 Integration Testing Underway



SKYSAT-2 UNDER CONSTRUCTION



Attachment I

Critical Design Review Package for two-satellite SkySat-1
program (15 Documents)

REDACTED

Attachment J

Biographies of Skybox Imaging staff with design and
manufacturing expertise

REDACTED