

### **Description of Application**

Spire Global, Inc. (“Spire”) hereby requests authority to add the MINAS satellite constellation as a point of communication for the licensed earth stations in Attachment A.<sup>1</sup> Spire has coordinated all UHF operations with the concerned U.S. Federal agency operators.<sup>2</sup> Consistent with previously submitted applications,<sup>3</sup> and to the extent necessary, Spire requests waiver of the rules and submits that good cause exists for grant of the previously-approved waivers.<sup>4</sup> As Spire requests no other changes to these earth stations, expeditious grants are in the public interest.

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<sup>1</sup> See Stamp Grant, Spire, File No. SAT-PDR-20190321-00018, Call Sign S3045 (granted in part Oct. 7, 2019) (“Grant”). In the accompanying Form 312, Schedule Bs, some earth stations may possess two 402-403 MHz (“UHF”) antennas with both transmit and receive capabilities. However, only one UHF antenna will transmit or receive at any time; the other UHF antenna acts as a backup.

<sup>2</sup> See Grant at 13.

<sup>3</sup> See Application of Spire, File No. SAT-PDR-20190321-00018, Exhibit A at 4-6 (filed Mar. 21, 2019); Application of Spire, SAT-LOA-20151123-00078, Exhibit A at 23-24 (filed Nov. 23, 2015); Application of Spire, SAT-AMD20161114-00107, Exhibit A at 12-23 (filed Nov. 14, 2016); Application of Spire, SAT-AMD-20180102-00001, Exhibit A at 18-21 (filed Jan. 2, 2018).

<sup>4</sup> See 47 C.F.R. § 1.3; see also *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969), cert. denied 409 U.S. 1027 (1972); *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1166 (D.C. Cir. 1990).

**Attachment A**

<b>Call Sign</b>	<b>Location</b>
E160037	Naalehu, HI
E160032	Hartford, CT
E160038	Piti, GU
E160039	Tukwila, WA
E160041	Richardson, TX
E160043	San Francisco, CA
E160044	Saint Croix, VI
E170171	Charlotte, NC
E170148	Juneau, AK
E170149	Tucson, AZ
E170150	Duluth, MN
E160033	Boulder, CO