

To Federal Communications Commission

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Vienna, July 16, 2025

Re: SB Docket No. 25-201 and ICFS File No. SAT-MOD-20250612-00145 Experimental licenses for AST & Science LLC (AST) from 430-440 MHz

Dear Sirs

The Austrian Amateur Radio society (ÖVSV) represents the interests of amateur radio operators in Austria. It is also a member of the International Amateur Radio Union (IARU). This independent, nonprofit association's primary responsibility is to promote amateur radio services regulated by international law and support its members.

On August 2, 2025, the Federal Communications Commission (FCC) granted AST & Science LLC (AST) experimental licenses for operating various non-geostationary satellites in the 430–440 MHz range (DA-24-756A1).

On June 20, 2025, the FCC accepted AST's filing for an additional 243 satellites to perform telemetry, tracking, and control (TT&C) operations in the 70 cm band (DA-25-532A1).

These satellites will transmit telemetry, tracking, and control (TT&C) transmissions. The following frequencies will be used: 430.5 MHz, 432.3 MHz, 434.1 MHz, 435.9 MHz, and 439.5 MHz. Signals from AST satellites have already been received in Germany and the Netherlands. These areas use narrowband communication with weak signals, which also affects the primary satellite range in the 70 cm amateur radio band. These transmissions will interfere with the 70 cm band amateur radio service in Austria, among others.

Operating these satellites in the 430–440 MHz range falls under Article 4.4 of the Radio Regulations (RR). In our opinion, it should be verified that this exception has been applied correctly under Article 4.4 of the Radio Regulations. However, the FCC does not allow operation in this frequency range in the US; yet, radio communications are affected in many other countries.

We request confirmation that the AST satellites will not cause harmful interference to authorized radio services in the 430–440 MHz frequency band in Austria.

We look forward to hearing from you on this matter.

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