

To: Laura Stefani
E-Mail: lastefani@Mintz.com
From: Nimesh Sangani
Date: March 18, 2019

Subject: Additional Information Request

Message:

IB has provided additional comments. Please respond to the following:

Thank you for the information concerning the satellite name, the ITU filing name, and the scope of ground station operations.

With respect to the requested information concerning the satellite, while the FCC is not authorizing the satellite (so it should not be listed in the Form 442) you are required to provide information concerning orbital debris mitigation plans for the satellite. Many applicants choose to do this by submitting an orbital debris assessment report (ODAR), and we would suggest that you do this. Another option is to submit a showing that the satellite operations are subject to "direct and effective" regulatory oversight by PNG. Our experience with PNG to date suggests this will be a difficult showing to make, but as an administration they have continued to expand their role in authorizing space activities, so perhaps there are some new developments. If you wish to pursue this approach, we would need a copy of the relevant PNG law and a description of their process for reviewing orbital debris mitigation plans. A copy of materials submitted to PNG to support their review would also facilitate review. There is discussion of these requirements in the Commission's 2004 Order adopting debris mitigation rules, and in our more recent NPRM on updates to those rules, adopted at the November meeting.

With respect to registration with the UN Office of Outer Space Affairs, although PNG has brought into use multiple ITU filings, to date it appears they have registered only 1 satellite. Our understanding is that registration may require additional steps with the PNG administration, compared to ITU filing. A statement from an official at the National Information and Communications Authority, or the appropriate decision maker within the PNG administration, indicating that PNG intends to register the Blue Walker 1 space object covered by the MICRONSAT ITU filing, is a possible response to this information request.

Concerning the confidentiality request, please take a careful look at exhibits to identify text that is not within the narrow scope of material you are trying to protect, and provide that in the public file.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of March 18, 2019 may result in application dismissal pursuant to Section 5.67 and forfeiture of the filing fee pursuant to Section 1.1108.

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Responses to this correspondence must contain the Reference number : 46815