

Ex Parte

435 N. Whisman Rd Ste 100
Mountain View, CA 94043
regulatory@swarm.space

March 9, 2021

Marlene H. Dortch, Secretary
Secretary, Federal Communications Commission
45 L Street NE
Washington, DC 20554

**Re: Swarm Technologies, Inc., IBFS File No. SAT-LOA-20181221-00094,
SAT-MOD-20200501-00040, and SAT-AMD-20200504-00041, Call Sign S3041.**

Dear Ms. Dortch:

On March 5, 2021, Dr. Sara Spangelo, Chief Executive Officer, and Dr. Kyle Wesson, Lead Regulatory Engineer, of Swarm Technologies, Inc. (“Swarm”), along with Mr. Shiva Goel of Harris, Wiltshire & Grannis LLP spoke with Ms. Merissa Velez, Ms. Alyssa Roberts, Ms. Kimberly Baum, Mr. Samuel Karty, and Mr. Karl Kensinger of the International Bureau about the ongoing very-high frequency (“VHF”) processing round and the above-referenced filings.

The parties discussed Swarm’s progress with Federal stakeholders regarding the partial waiver of U.S. Footnote 323, what such a waiver would enable for near- and long-term operations in support of USG interests, and additional techniques to further protect Federal operators beyond those described in the above-referenced Amendment.

In addition, Swarm discussed the date by which grant of the above-referenced Modification would be necessary for Swarm to deploy future VHF satellites with an onboard propulsion system and the necessary technical changes required to support the propulsion system (i.e., the satellites would have a mass of approximately 0.60 kg and would replace Ku-band radar retro reflectors with GPS antennas in order to accommodate the propulsion system within a 1/4U form factor).¹

¹ See Swarm Technologies, Inc., Application to Modify the Authorization for the Swarm NGSO Satellite System, IBFS File No. SAT-MOD-20200501-00040 (filed May 1, 2020), at Narrative p.3 & Table 1; id. at 4-7.

Please do not hesitate to contact me with any questions.

Sincerely,

Kyle Wesson

Kyle Wesson, Ph.D.
Lead Regulatory Engineer
Swarm Technologies, Inc.

cc: FCC meeting participants

Mr. Walter H. Sonnenfeldt, Esq. (via E-Mail)
Regulatory Counsel, ORBCOMM License Corp.

Mr. Stephen L. Goodman (via E-Mail)
Counsel to ORBCOMM License Corp.

Mr. Janek Kaucz (via E-Mail)
Spectrum & Regulatory Specialist, Myriota Pty. Ltd.

Mr. Eric B. Graham (via E-Mail)
Counsel to Myriota Pty. Ltd.