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September 16, 2020

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: IBFS File Nos. SAT-LOA-20190807-00072; SAT-AMD-20200527-00063

Dear Ms. Dortch:

On September 9, 2020, Alex Greenberg, the Chief Operating Officer of Loft Orbital Solutions Inc. ("Loft Orbital"), spoke with Karl Kensinger, Acting Satellite Division Chief of the International Bureau ("Bureau"), regarding the above-referenced application, which is subject to permit-but-disclose *ex parte* rules.¹ On September 11, 2020, representatives of Loft Orbital spoke with representatives of the Bureau regarding the same application. Participating in the second meeting on behalf of Loft Orbital were: Alex Greenberg; and Tony Lin, outside counsel. Participating in the second meeting on behalf of the Bureau were: Karl Kensinger; Jay Whaley, Acting Policy Branch Chief; Merissa Velez, attorney advisor Policy Branch; and Jameyenne Fuller, attorney advisor Policy Branch.

During the meetings, the Bureau requested clarification of several items in the application and the parties discussed grant of the application. Provided below are the responses to the Bureau's requests for clarification.

- The L-band data signals in the 1535-1559 MHz band, transmitted from Inmarsat satellites, are generally broadcast to subscribers of the location accuracy enhancing service and not to Loft Orbital specifically. The signal provides satellite navigation correction data to enhance the receiving parties' location accuracy assessment.²
- The IoT Payload uses the 400.05-400.15 MHz band for downlink beacon transmissions of precise frequency and/or accurate time information. The IoT Payload is equipped with a Global Positioning System ("GPS") receiver, which will obtain highly accurate time signals

¹ See Public Notice, Report No. SAT-01494, DA 20-977 (Aug. 28, 2020).

² See Application of Loft Orbital, IBFS File No. SAT-LOA-20190807-00072, Narrative at 6, 16-17 (filed Aug. 7, 2019).

from the GPS L1 signal (center frequency located at 1575.42 MHz), which then may be transmitted in the beacon signal.

- When the IoT Payload beacon signal is received by a terrestrial short-range radiofrequency device (“SRD”) that is a part of the IoT network, the SRD will initiate a data uplink transmission.
- By monitoring the location of YAM-2 and working closely with organizations, such as the Combined Space Operations Center, Loft Orbital will ensure that its satellite will not be a hazard to any crewed spacecraft, including the International Space Station. YAM-2 does not have a propulsion system for orbit adjustment or decommissioning purposes, but it is able to conduct collision avoidance maneuvers using differential drag techniques with sufficient advance notice. Loft Orbital expects that YAM-2 will continue to be operational when it is de-orbiting through the 400 km orbital altitude.

Please direct any questions regarding this letter to the undersigned.

Respectfully submitted,

/s/ Tony Lin

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cc: (via email)
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