



August 5, 2016

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20556

Re: *Ex Parte* Letter – File Nos. SAT-STA-20150821-00060; SAT-MOD-20150802-00053; SAT-LOA-20151123-00078

Dear Ms. Dortch:

On August 3, 2016, ORBCOMM, represented by the undersigned, participated in a telephone call with Jose Albuquerque, Chief of the Satellite Division, to address the timing of ORBCOMM's planned response to the July 26, 2016 submissions relating to the above-referenced applications filed by Planet Labs Inc. ("Planet Labs") and Spire Global, Inc. ("Spire"). ORBCOMM indicated that it would file its response by early next week. ORBCOMM also observed that the August 15 integration date referred to in Spire's new submission as establishing an imminent deadline for Commission action does not appear to still be operative due to the reported slippage of the launch date for the proposed Spaceflight, Inc. SHERPA mission. In addition, ORBCOMM indicated that the above-referenced applications, along with the possibility of other future applications for authority to deploy large numbers of non-geostationary satellites using opportunistic launches and other cost-saving measures, counsels the Commission to initiate a rulemaking proceeding to consider non-geostationary satellite rule and policy updates that *inter alia* might better accommodate these types of systems, which clearly do not fit well into the current rules. While the Commission can and should address the above-referenced applications under the current rules, carefully-tailored modifications to the rules could substantially improve the process for future applicants, incumbents, and the Commission.



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Page 2 of 2

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically in the above-referenced proceedings. Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,



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cc: Dr. Jose Albuquerque