

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Spire Global, Inc.	)	File No. SAT-LOA-20151123-00078
	)	Call Sign S2946
	)	
Application for Authorization	)	
to Launch and Operate a	)	
Non-Geostationary (“NGSO”) Satellite	)	
System to Provide Maritime Monitoring,	)	
Meteorological Monitoring, and Earth	)	
Imaging Services	)	

**WITHDRAWAL OF PETITION**

ORBCOMM License Corp. (“ORBCOMM”), pursuant to Section 25.154 of the Commission's Rules, as explained below, hereby withdraws its Petition seeking to dismiss, deny, or hold in abeyance the above-captioned application of Spire Global, Inc. (“Spire”) for an FCC space segment license to launch and operate a constellation of non-geostationary satellites (the “Spire Application”). ORBCOMM filed its Petition because the Spire Application requested authority to deploy an indeterminate number of satellites into an orbit intersecting with ORBCOMM’s non-geostationary satellite constellation, creating legitimate concerns about potential collisions. After extensive supplementation of the Spire Application record and substantial efforts by both parties, Spire and ORBCOMM have reached an agreement, including requested license conditions (being filed separately), that mitigates ORBCOMM’s concerns so that it can withdraw its objection to grant of the Spire Application.

Even though it is removing its objection to grant of the Spire Application, ORBCOMM remains concerned about any increased risks of collision and debris hazards that may affect

ORBCOMM's satellite system. Of specific relevance to the Spire Application and related proceedings is the need to address mission abort criteria in the event of a SpaceX Formosat-5 launch mission anomaly that precludes lowering the Falcon 9 2d stage from the intended primary Formosat-5 720 km circular release orbit to the specified 450 x 720 km 98 degree inclined release orbit for Spaceflight, Inc.'s proposed SHERPA secondary satellite payload deployment mission (the "SHERPA mission"). However, ORBCOMM recognizes that Spire may not have sufficient capability to unilaterally specify or require abort criteria relating to the SHERPA mission. Accordingly, ORBCOMM urges the Commission to adopt appropriate conditions on licenses relating to the SHERPA mission to clearly specify abort criteria; *both* for SHERPA separation from the Falcon 9 second stage, and for release of the SHERPA mission secondary payload satellites.

ORBCOMM also notes that its agreement with Spire does not reach consensus on a proper methodology for quantifying the probabilistic risk of collision risks and debris hazards affecting ORBCOMM's satellites that may arise from the SHERPA mission and deployment of the 8 Spire satellites in their specified elliptical orbit. Nonetheless, as a result of the agreement reached between ORBCOMM and Spire, ORBCOMM hereby withdraws its Petition seeking to dismiss, deny, or hold in abeyance the Spire Application.

Respectfully submitted,



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September 15, 2016

## **CERTIFICATE OF SERVICE**

I, Walter H. Sonnenfeldt, hereby certify that on this 15<sup>th</sup> day of September, 2016, I served a true and correct copy of the foregoing ORBCOMM License Corp. Withdrawal of Petition via first-class postage prepaid mail upon the following:

Trey Hanbury  
Hogan Lovells US LLP  
555 Thirteenth Street, NW  
Columbia Square  
Washington, D.C. 20004

A handwritten signature in blue ink, appearing to read "W.H. Sonnenfeldt", is written over a horizontal line.

Walter H. Sonnenfeldt