

Morgan Lewis

Timothy L. Bransford

Partner
+1.202.373.6140
timothy.bransford@morganlewis.com

February 20, 2018

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Notice of Ex Parte Communication - Audacy Corporation, Application for Authority to Launch and Operate a Non-Geostationary Medium Earth Orbit Satellite System in the Fixed- and Inter-Satellite Services, IBFS File No. SAT-LOA-20161115-00117*

Dear Ms. Dortch:

On February 15, 2018, James Spicer (Chief Engineer) from Audacy Corporation ("Audacy"), accompanied by Tim Bransford and Denise Wood of Morgan, Lewis & Bockius LLP, met separately with representatives from the Offices of Chairman Ajit Pai, Commissioner Brendan Carr and Commissioner Jessica Rosenworcel, as well as International Bureau staff to discuss the above-captioned Non-Geostationary ("NGSO") satellite license application of Audacy for a space-based relay network pending before the Federal Communications Commission ("FCC" or "Commission"). A full list of attendees at each meeting is attached to this filing.

During the meetings, Audacy discussed the important public interest benefits of its proposed NGSO system, including how Audacy's relay satellites will help solve or alleviate:

- The ongoing spectrum crunch in space making the coordination of Low Earth Orbit ("LEO") satellites complicated and burdensome (and in some instances impossible) by eliminating the need for individual ground infrastructure and space-to-earth links to support each new mission.
- The looming orbital debris crisis, particularly for LEO satellites, by providing a suite of enhanced services ensuring that spacecraft operators have access to real-time data concerning their spacecraft that is unavailable today. For example, among other benefits, Audacy's relay network will allow spacecraft operators to continuously monitor the health and flight path of their spacecraft and take appropriate action in advance of a system failure or potential collision.

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

T +1.202.739.3000
F +1.202.739.3001

February 20, 2018

Page 2

Audacy further elaborated that given the unique qualities of its proposed relay satellites (with service links exclusively in space between Audacy relays and customer spacecraft), its network will be compatible with existing and planned spectrum uses. Moreover, Audacy discussed the significant progress that has been made with respect to planning and future implementation of its relay network.

To the extent you have questions or concerns, please feel free to contact the undersigned. Attached please also find a copy of the slide deck distributed during Audacy's meetings.

Very truly yours,

/s/

Timothy Bransford

Counsel for Audacy Corporation

cc (via email): See Attachment

ATTACHMENT

Feb. 15, 2018 Meeting with the Office of Chairman Ajit Pai

FCC Attendees

Rachael Bender

Audacy Corporation Attendees

James Spicer

Tim Bransford

Denise Wood

**_*_*_*_*_

Feb. 15, 2018 Meeting with the Office of Commissioner Brendan Carr

FCC Attendees

Will Adams

Audacy Corporation Attendees

James Spicer

Tim Bransford

Denise Wood

**_*_*_*_*_

Feb. 15, 2018 Meeting with the Office of Commissioner Jessica Rosenworcel

FCC Attendees

Umair Javed

Audacy Corporation Attendees

James Spicer

Tim Bransford

Denise Wood

**_*_*_*_*_

Feb. 15, 2018 Meeting with the International Bureau

FCC Attendees

Jose Albuquerque

Karl Kensinger

Stephen Duall

Cindy Spiers

Diane Garfield

February 20, 2018

Page 4

Paul Blais

Troy Tanner

Audacy Corporation Attendees

James Spicer

Tim Bransford

Denise Wood



Audacy delivers anytime & seamless space connectivity, advancing humanity to a new age of commerce, exploration, and discovery.

Audacy Space Station Application Progress

Audacy Overview:

- Concept & Architecture
- Public Interest Benefits

Status Updates:

- Major Milestones
- Industry Recognition

Application Progress:

- FCC Questions
- Regulatory

February 15, 2018

Audacy

<http://audacy.space>

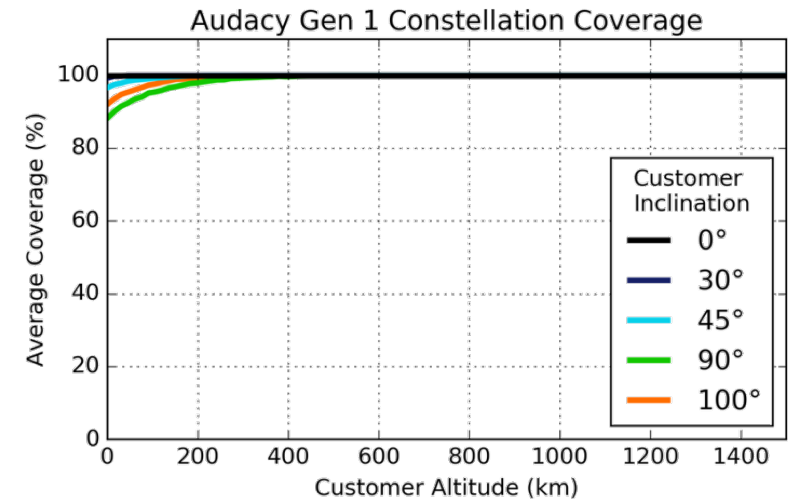
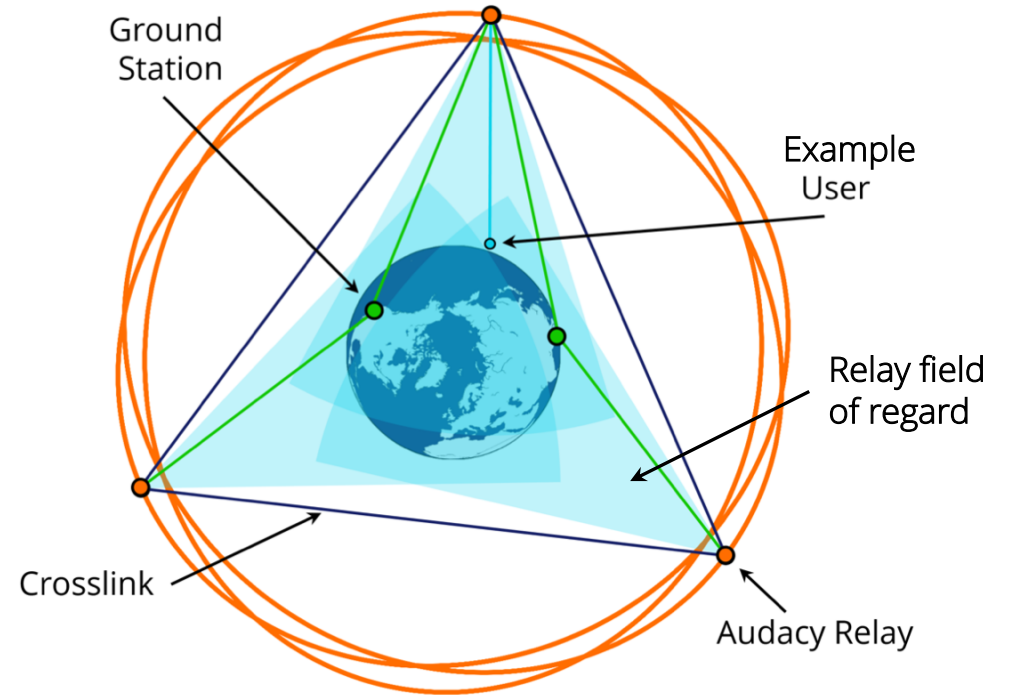
info@audacy.space

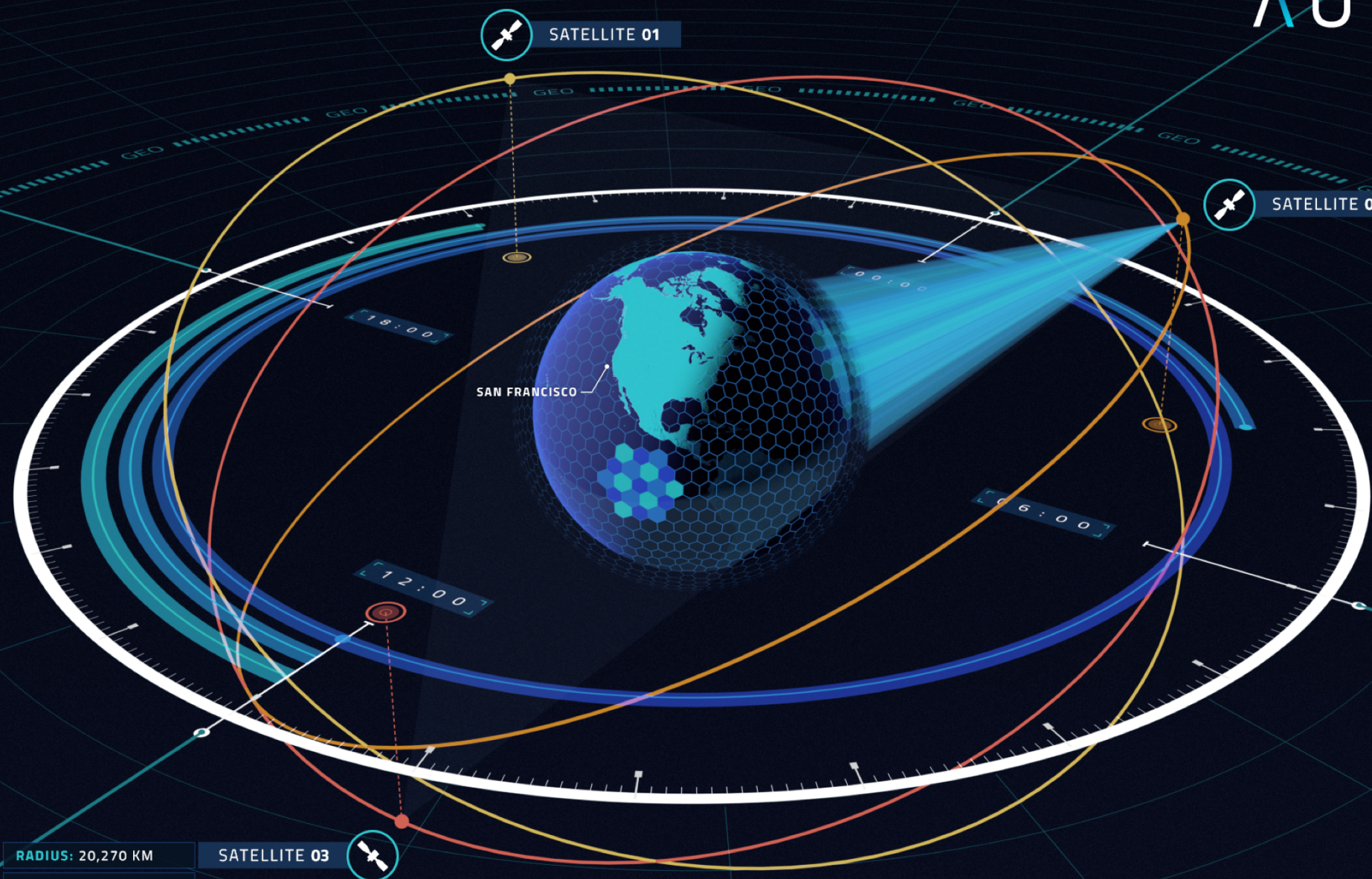
THIS PRESENTATION AND ANY ATTACHMENTS THERETO MAY CONTAIN PRIVATE, CONFIDENTIAL, AND PRIVILEGED MATERIAL OF A COMPETITION SENSITIVE NATURE FOR THE SOLE USE OF THE INTENDED RECIPIENTS. ANY REVIEW, COPYING, OR DISTRIBUTION OF THIS MATERIAL BY OTHERS IS PROHIBITED. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE CONTACT AUDACY AND PERMANENTLY DELETE THE ORIGINAL AND ANY COPIES OF THIS MATERIAL. PLEASE DO NOT REPRODUCE AND/OR REDISTRIBUTE WITHOUT PRIOR PERMISSION OF THE OWNER.

AUDACY ARCHITECTURE

- Seamless, on-demand connectivity anywhere in LEO.
- Continuous LEO coverage with only 3 Relays.
- MEO orbit has 8.3 dB advantage over GEO. User equipment is 5× smaller, data rates 5× greater.
- Relay-Relay links enable enhanced security, path diversity, and redundancy. Audacy ground facilities are at global business hubs.

100% coverage of LEO –
anytime, anywhere.





SATELLITE 01

SATELLITE 02

SATELLITE 03

RADIUS: 20,270 KM
ALTITUDE: 13,892 KM
PERIOD: 07:58:41
INCLINATION: 29°

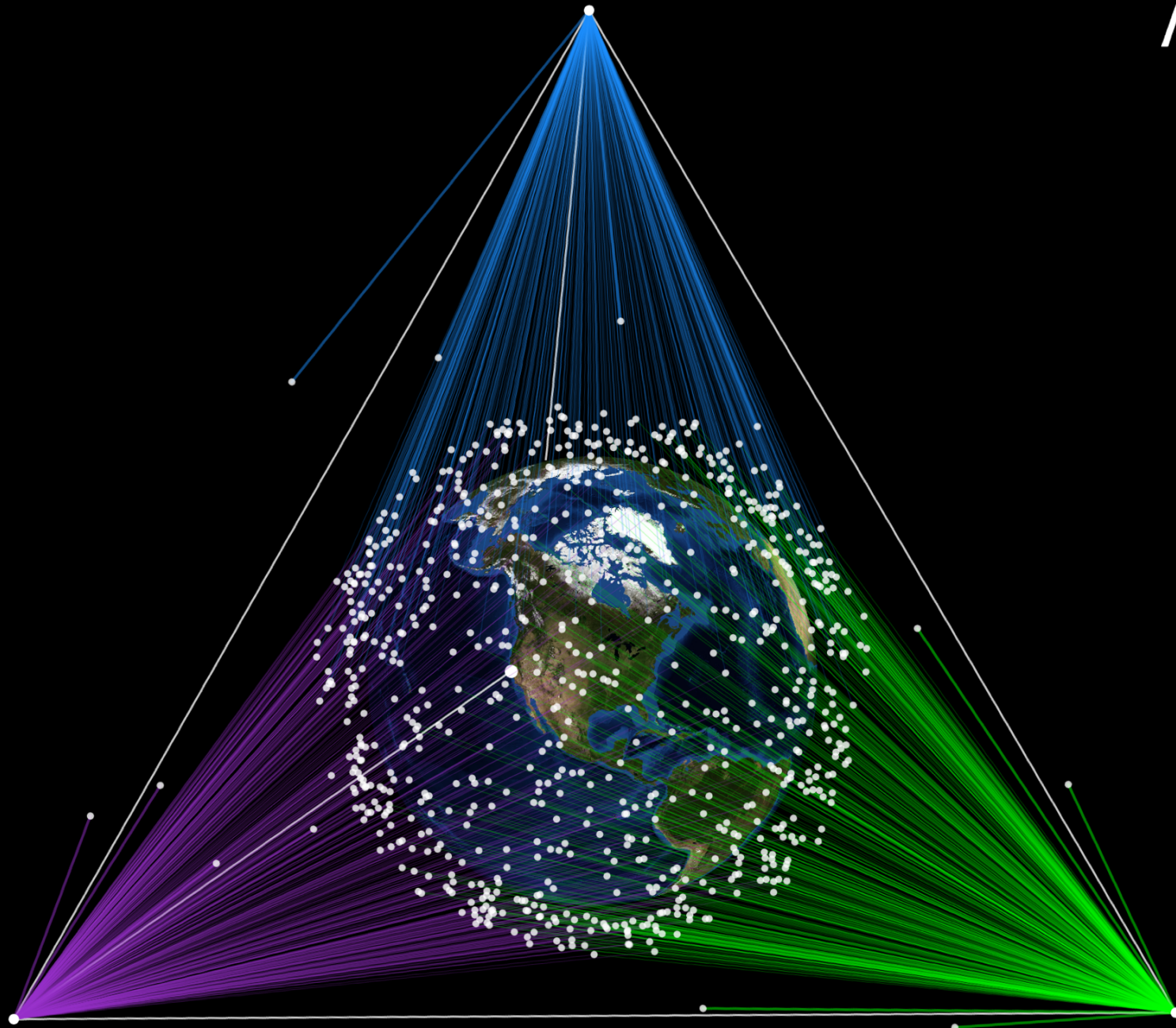
SAN FRANCISCO

12:00

06:00

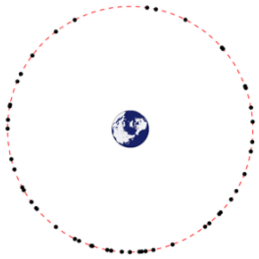
18:00

00:00



AUDACY EASES SPECTRUM CRUNCH

1970 - 2010



1 MONTH

2010 - 2017

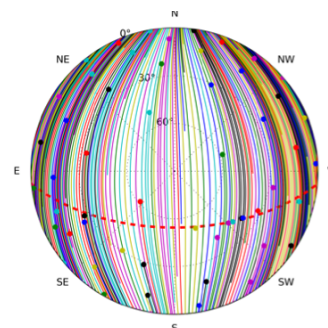
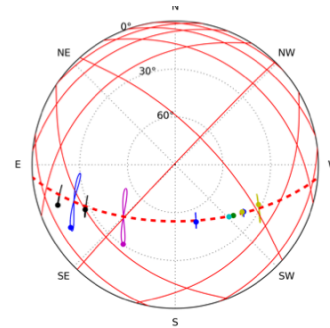
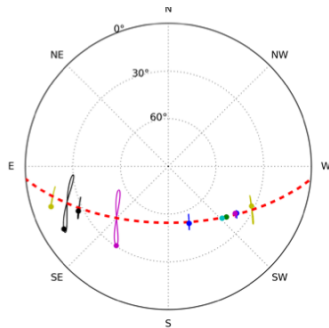


1 DAY

2018+

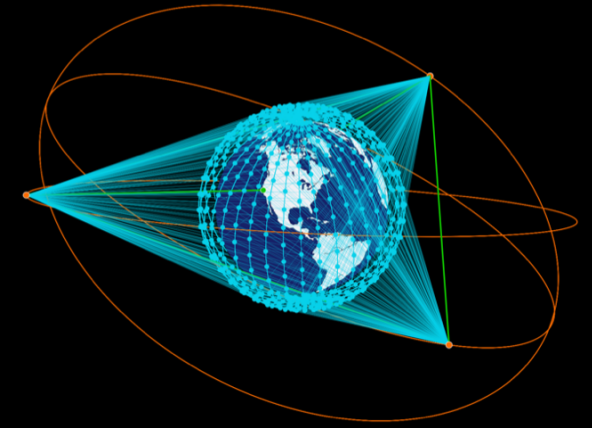


1 HOUR

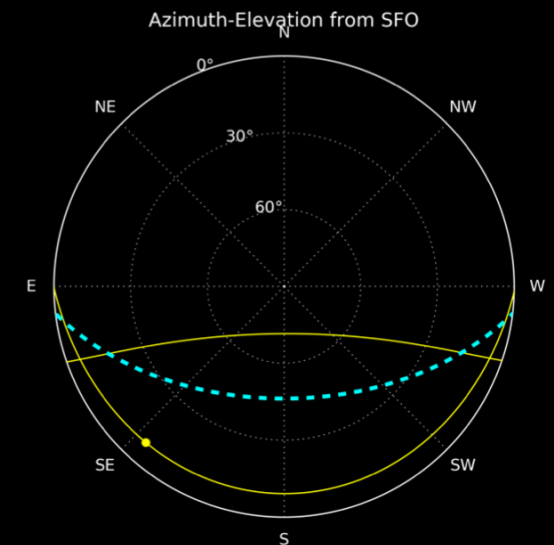


Coordination of ground-space spectrum for non-geostationary satellites is increasingly expensive, takes years, and is continually contested.

AUDACY



Audacy's orbit design consolidates spectrum in a **repeating track** at **only 3 global locations**.



AUDACY OFFERS TURNKEY SIMPLICITY

Satellite communications streamlined and simplified



Step 1

Install an Audacy-certified customer terminal on your spacecraft.



Step 2

Reserve Audacy network capacity using Audacy's online customer scheduling portal.



Step 3

Command, monitor, and downlink from your spacecraft anytime via any internet-enabled device.

COMPANY UPDATES



SpaceNews
Cover Story
Dec '16



Paris Air Show
Presenter
Jun '17



ISS R&D Conference
Presenter
Jul '17



NASA iTech
Top 10
Aug '17



Customers
100+
Sep '17



Series A
Incl. Fidelity
Oct '17



Global Space Convention
Singapore
Feb '18



NewSpace Europe '17
Presenter
Nov '17

Cleanroom Construction
May '17



Singapore
First 2 Hires
Oct '17

Business
Operations
Engineering

2016



Quindar Beta
Apr '17



Customers Breakeven
Feb '17



Audacy Lynq CASIS Grant
Jun '17



Audacy Zero Integration
Aug '17



Client Terminal Eng Test Unit
Sep '17



Audacy Zero FCC Expm'l License
Oct '17

2017



2018

2 x Gateway Antenna Manufacturer ATP
Dec '17
Delivery Q3/4 '18

SF Facility Lab/Cleanroom Expansion
Feb '18

INDUSTRY RECOGNITION

International Ground stations tricky for SmallSat operators to license.

"Governments have an awful lot to say when they think they've got [a foreign ground station] in their backyard. Now imagine that with a couple dozen earth stations for a constellation - it's just torture."



- Sasha Field | OneWeb's Deputy General Counsel
Space News, Caleb Henry, Feb 7, 2018

SPACENEWS

"Teleports groaning under the strain of proliferating satellites. Firms building the new constellations are not interested in investing in the associated ground infrastructure."

- Debra Werner | Space News
March 6, 2017

SPACEFLIGHT NOW

Ariane 5 Deploys Satellites in Wrong Orbit due to Telemetry Loss

"The Ariane 5 disappeared over the horizon a few seconds after igniting its upper stage, and officials never heard from it again as the second tracking station in Brazil did not acquire the launcher telemetry."

- Stephen Clark | Spaceflight NOW
January 26, 2018



"Douglas Terrier presents Dr. Ralph Ewig with a certificate recognizing Audacy as a Top 10 Innovation in 2017."

- Douglas Terrier | NASA CTO
NASA iTech, July 13, 2017



"Audacy's real-time relay network is the future. We hope to see all satellite imagery providers on such a network and will favor providers that are."



Descartes Labs

- Adam Smith | Descartes Labs
Co-Founder, Head of BD and Sales

SPACENEWS

BUSINESS | POLITICS | PERSPECTIVE

DECEMBER 5, 2016



Constant Contact

An Earth-to-LEO comms revolution in the making

"With an avalanche of commercial spacecraft headed for orbit, Audacy is an Earth-LEO comms revolution in the making."

- Space News Magazine
December 2016



AUDACY

<http://audacy.space>