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Via IBFS & ECFS

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

**Re: Notice of Ex Parte Communication - IBFS File No. SAT-LOA-20181221-00094;
Call Sign S3041; IB Docket No. 18-313, Mitigation of Orbital Debris in the New
Space Age**

Dear Ms. Dortch:

On February 6, 2019, Dr. Sara Spangelo, Chief Executive Officer, and Mr. Kalpak Gude, General Counsel, of Swarm Technologies, Inc. (Swarm), met with Commissioner Jessica Rosenworcel of the Federal Communications Commission (Commission), as well as Umair Javed, Legal Advisor, and Jessica Martinez, Special Advisor, to Commissioner Rosenworcel.

The meeting participants discussed Swarm's above-referenced satellite system application pending before the Commission. Specifically, the participants discussed the benefits of Swarm's revolutionary satellite technology, which will facilitate low-cost communications to underserved or unserved areas of the United States. In addition, Swarm discussed orbital debris issues and mitigation strategies, including the viability of future requirements to affirmatively deorbit spacecraft positioned in low earth orbits at altitudes above 650 kilometers, which are not self-cleaning, and where spacecraft may continue to orbit for periods in excess of 25 years without propulsive or other special de-orbit capabilities. Swarm further elaborated on the self-cleaning nature of lower orbits, where spacecraft and debris re-enter the Earth's atmosphere absent affirmative de-orbiting maneuvers. Swarm also urged that the Commission take an analytical approach to the orbital debris issue.

To the extent you have questions or concerns, please feel free to contact the undersigned.

Very truly yours,

/s/

Timothy Bransford
(Outside Counsel to Swarm Technologies, Inc.)

cc (via email): Hon. Jessica Rosenworcel
Umair Javed
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