Federal Communications Commission
Washington, D.C. 20554

November 13, 2015

Mr. Michael Safyan
Director of Launch and Regulatory
Planet Labs Inc.
346 9th St.
San Francisco, CA 94103

Re: Planet Labs Inc. Application for Modification of NGSO
Authorization to Launch and Operate Earth Imagery Satellite Systems
IBFS File No. SAT-MOD-20150802-00053, Call Sign S2912

Dear Mr. Safyan:

On August 2, 2015, Planet Labs Inc. (Planet Labs) filed an application to modify its license for a non-geostationary orbit Earth Exploration Satellite Service constellation by requesting authority to launch up to 600 satellites, with up to 200 satellites simultaneously operating at any given time.[1] The request seeks to deploy and operate satellites in orbits ranging from 350 km up to 720 km, with the majority of satellites being launched to a circular orbit at 475-km altitude.[2] The application includes a plan to mitigate the creation and effects of orbital debris. To evaluate whether the proposed the orbital debris mitigation plan is in the public interest, we ask Planet Labs to provide supplemental information.[3]

Specifically, we ask Planet Labs to provide information regarding the aggregate risk of accidental collision with catalogued space objects from the proposed satellite constellation, both during operations and disposal. In particular, please provide a worst case scenario for the risk of accidental collisions, for example assuming all satellites are deployed in the longest-lived orbit, as well as any alternative scenarios that model anticipated realistic deployment patterns. Please also address whether variations in the solar cycle – particularly the possibility of lower than average sunspot activity in cycle 25 – would have any impact on the orbital lifetimes of the proposed constellation or on the aggregate risk of accidental collisions identified above.

[1] *See* Application, Exhibit 43 at 1.

[2] *Id. at 1-3.* The application states that the proposed space segment will be comprised of up to 200 simultaneously operating satellites with a minimum circular altitude of 350 km and a maximum circular altitude of 660 km. The application also proposes elliptical orbits, with a maximum apogee of 720 km. *Id.* at 3.

[3] 47 C.F.R. § 25.111(a)

We ask that Planet Labs provide this requested information by December 11, 2015, in order to continue the consideration of Planet Lab's application.[4]

Sincerely,

Jose Albuquerque

Jose P. Albuquerque
Chief, Satellite Division
International Bureau

[4] 47 C.F.R. § 25.112(c).