



May 17, 2016

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW

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

Dear Ms. Dortch:

At the request of the Chief of the Policy Branch of the International Bureau's Satellite Division, on May 16, 2016, ORBCOMM participated in a conference call with several Satellite Division staff members to discuss the above-referenced Spaceflight, Inc. ("Spaceflight") STA Application (File No. SAT-STA-20150821-00060, the "STA Request") relating to Spaceflight's proposed SHERPA secondary payload satellite deployment mission on the SpaceX Falcon 9 Formosat-5 launch (the "SHERPA mission"). The Satellite Division participants on the call were Jose Albuquerque, Karl Kensinger, Stephen Duall, and Merissa Velez. The ORBCOMM representatives on the call were John Stolte, Walter Sonnenfeldt, Gene Fujii, and Chris Becek.

The Satellite Division's agenda for the conference call focused on identifying possible solutions to unresolved issues and concerns raised in ORBCOMM's May 11, 2016 comments on the STA Request, and Spaceflight's May 13, 2016, response submission. The discussions also touched on the pending applications of Planet Labs Inc. (File No. SAT-MOD-20150802-00053) and Spire Global, Inc. (File No. SAT-LOA-20151123-00078), because satellites from both of these companies are included on the proposed SHERPA mission manifest. Accordingly, this *Ex Parte* Letter is being filed in those proceedings as well.

The discussions centered on possible alternatives to address unresolved concerns with respect to possible in-orbit collision risks arising from the proposed SHERPA mission deployment of approximately 90 satellites into a single elliptical orbit plane that would intersect with the entire fleet of ORBCOMM Generation 2 ("OG2") satellites. ORBCOMM explained the attempts it made to discuss its concerns with Spaceflight, Planet Labs, and Spire Global prior to submitting its informal comments on the STA Request. Although it is presumed that the various entities that have satellites on the proposed SHERPA mission manifest would be responsible for managing their own respective post-deployment satellite operations, as the STA applicant, Spaceflight has principal responsibility for finalizing the SHERPA mission satellite manifest, as well as determining the proposed order and manner in which those satellites would be deployed from the SHERPA spacecraft. Consistent with ORBCOMM's comments, call participants also discussed the need to collect and disseminate required additional information relating to the



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SHERPA mission secondary payload satellites, as well as the necessity of Spaceflight's full cooperation to assess the risks of possible in-plane collisions among SHERPA mission satellites, and the potential additive risks of collision with OG2 satellites from any resulting hazardous debris. Additional potential solutions to unresolved SHERPA mission concerns were also discussed, including the possibility of lowering the insertion orbit apogee of the SHERPA mission and/or FORMOSAT-5 spacecraft, and means to facilitate direct information exchanges with regard to potential conjunction alerts. Finally, ORBCOMM also informed Satellite Division Staff that discussions remain ongoing to try to reach respective agreements regarding OG2 collision avoidance procedures with Planet Labs and Spire Global relating to their proposed SHERPA mission satellite deployments.

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

Respectfully submitted,



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