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August 18, 2016

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

Planet Labs Inc. (“Planet”), through its counsel, hereby replies to the letter submitted by ORBCOMM License Corp. (“ORBCOMM”) on August 9, 2016 in the above-referenced application proceedings.¹ The letter suggests that ORBCOMM does not object to the grant of authority allowing Planet to launch and operate the fifty-six Flock 2c satellites manifested on the SHERPA spacecraft,² provided the International Bureau (“Bureau”) condition the grant of the Planet application on the parties’ exchange of GPS-derived location information for the relevant satellites.³ Planet has no objection to

¹ See Letter from Walter H. Sonnenfeldt, Regulatory Counsel, ORBCOMM, to Marlene H. Dortch, Secretary, FCC (August 9, 2016) (“ORBCOMM-Planet Letter”).

² See ORBCOMM-Planet Letter at 1 (“ORBCOMM believes that in light of its preliminary analysis of the additional information provided by Planet Labs, and with appropriate license conditions, the Commission may be able to grant Planet Labs’ request to launch 56 Planet Labs Flock 2c satellites on Spaceflight’s proposed SHERPA secondary satellite payload deployment mission.”); see *also* Letter from Walter H. Sonnenfeldt, Regulatory Counsel, ORBCOMM, to Marlene H. Dortch, Secretary, FCC at 1 (August 9, 2016) (“ORBCOMM believes that in light of its preliminary analysis of the additional information provided by Spire and Planet Labs, and with appropriate license conditions, the Commission may be able to grant Spire’s request to include eight Lemur-2 satellites on the proposed SHERPA secondary satellite payload deployment mission.”).

³ See *id.* at 5.

the imposition of such a general license condition and will work in good faith with ORBCOMM, after grant of the Planet application, on a mutually acceptable process for that information exchange.⁴

To be sure, ORBCOMM expresses questions and concerns regarding specific aspects of the technical analyses conducted by Planet and others.⁵ However, ORBCOMM does not demonstrate that any of these questions or concerns rebuts Planet's orbital debris risk analysis or conclusion that the SHERPA mission meets NASA standards.⁶ Accordingly, the record evidence supports grant of the Planet application.

As ORBCOMM acknowledges, the mid-September mission integration date is quickly approaching.⁷ Accordingly, Planet requests that the Bureau act expeditiously and grant the remaining portion of the Planet application, thereby allowing the launch and operation of the fifty-six Flock 2c satellites manifested on the SHERPA vehicle.

Respectfully submitted,

/s/ Tony Lin

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⁴ Planet is also open to working with ORBCOMM "off the record" on an information exchange agreement prior to the grant of the remaining portion of the Planet application. However, such efforts should not dissuade the Bureau from acting immediately on the application.

⁵ See ORBCOMM-Planet Letter at 4.

⁶ For example, ORBCOMM suggests that Planet's Monte Carlo simulation, using 18 million sample pairs, is not a sufficiently robust analysis of a "complete mission." See ORBCOMM-Planet Letter at 4 n. 7. ORBCOMM, however, misses the point of Planet's inclusion of the Monte Carlo simulation results. Planet does provide a "complete mission" orbital debris risk analysis; it was done using the NASA DAS program, the industry-accepted standard which ORBCOMM itself has used for orbital debris calculations of its own satellites. NASA's DAS program shows that this "complete mission" risk (*i.e.*, all of the objects on the SHERPA mission) is COMPLIANT with the relevant NASA debris standards. The Planet simulation was intended to provide further, supplemental evidence of this conclusion, by calculating the risk between any two selected objects. By so doing, Planet is able to further demonstrate that orbital debris risk is well within NASA standards. Moreover, ORBCOMM's criticisms of Planet's Monte Carlo results are flawed. Mathematically, one cannot accurately or reliably extrapolate, as ORBCOMM has done here, the results of a Monte Carlo simulation allegedly having too few samples. Indeed, to calculate a statistically significant "complete mission" analysis as proposed by ORBCOMM, Planet would have to conduct a Monte Carlo simulation requiring between 10 billion and 100 billion sample pairs – a task that would require years of computation. For these same reasons, there is no basis to "compel" further technical submissions, as ORBCOMM requests. See ORBCOMM-Planet Letter at 5.

⁷ Under the current schedule, Planet is required to begin integration of its flight satellites onto the SHERPA payload stack by September 12, 2016.

cc: (via email)
Jose Albuquerque
Stephen Duall
Chip Fleming
Cindy Spiers

CERTIFICATE OF SERVICE

I, Noah Cherry, hereby certify that on August 18, 2016, a true and correct copy of this *ex parte* letter was sent by United States mail, first class postage prepaid, to the following:

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