

September 14, 2016

Via Electronic Filing (IBFS)

Jose Albuquerque, Chief
Satellite Division, International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Modification Application of Planet Labs Inc.
File No. SAT-MOD-20150802-00053

Dear Mr. Albuquerque:

We are pleased to inform you that, in connection with the above-referenced application of Planet Labs Inc. (“Planet”) to modify its satellite authorization (the “Planet Application”), ORBCOMM License Corp. (“ORBCOMM”) and Planet have reached agreement (the “Agreement”) concerning measures they will undertake to mitigate the risk of in-orbit collisions between the Planet satellite system (FCC Call Sign S2912) and the ORBCOMM satellite system (FCC Call Sign S2103) and to minimize the effect on operations of their respective satellite systems with regards to any related conjunction alerts, as detailed in this letter.

Specifically, pursuant to the Agreement, Planet shall not launch or operate any satellite in an orbit¹ that intersects with the FCC-authorized 715 km target orbital altitude of the ORBCOMM Generation 2 (“OG2”) satellites² during the remaining term of Planet’s satellite authorization, except for the fifty-six (56) Planet satellites (“Flock 2c”) manifested on the Spaceflight, Inc. SHERPA secondary payload mission for deployment into a 450 x 720 km 98 degree inclined elliptical orbit on the SpaceX Falcon 9 Formosat-5 launch. By a separate submission to be filed with the Commission concurrently with the submission of this executed Agreement, ORBCOMM is withdrawing its Petition to Dismiss, Deny, or Hold in Abeyance the Planet Application, thereby removing its objection to the grant of the Planet Application.³

Additionally, pursuant to the Agreement, Planet and ORBCOMM shall use reasonable best efforts to designate respective contact representatives and contact procedures to provide each other GPS-derived spacecraft position data⁴ no later than 4 hours after the issuance of a conjunction alert from the Joint Space Operations Center (“JSpOC”), the Space Data Association (“SDA”), or any other duly recognized conjunction reporting entity involving any OG2 satellite

¹ The maximum circular altitude requested in the Planet Application is 660 km. *See* Exhibit 43, Planet Application, File No. SAT-MOD-20150802-00053, at 3 (filed August 2, 2015).

² *See*, Application of ORBCOMM License Corp., File No. SAT-AMD-20140116-00006 (granted March 26, 2014).

³ *See*, ORBCOMM License Corp. Petition to Dismiss, Deny or Hold in Abeyance, File No. SAT-MOD-20150802-00053 (filed Jan. 19, 2016).

⁴ The Planet Flock 2c satellites shall have onboard GPS with position determination accuracy of less than 20 meters.

and Flock 2c satellite to minimize the occurrence of “false positive” conjunction alerts, and to maximize the effectiveness of any collision avoidance maneuvers that may need be performed.⁵ In the event that a conjunction alert occurs, the parties shall use their reasonable best efforts to acquire and exchange GPS-derived position data for the involved spacecraft, which efforts shall include any necessary interruption or alteration of spacecraft operation to prioritize the collection and dissemination of GPS-derived spacecraft position data. Further, Planet and ORBCOMM agree that Planet shall provide Spaceflight, Inc. and SpaceX a copy of this Agreement and Planet’s FCC authorization relating to the launch and operation of the Flock 2c satellites. The parties agree that the terms of the Agreement may be amended, but only by written mutual agreement of the parties.

Planet and ORBCOMM therefore request the Commission to adopt the following text as license conditions to the grant of the Planet Application:

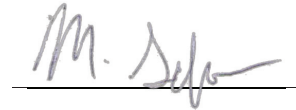
- Planet and ORBCOMM have entered into an agreement concerning measures they will undertake to mitigate the risk of in-orbit collisions between the Planet satellite system (FCC Call Sign S2912) and the ORBCOMM satellite system (FCC Call Sign S2103) and to minimize the effect on operations of their respective satellite systems with regards to any related conjunction alerts. The launch and operation of the Flock 2c satellites in a manner consistent with that agreement, as may be amended by mutual written agreement of the parties from time to time, is a condition of the Commission’s grant of authorization for the Flock 2c satellites.
- During the remaining term of this license, Planet is not authorized to launch or operate any satellite in an orbit that intersects with the 715 km orbital altitude, except for the fifty-six (56) Planet Flock 2c satellites manifested on the Spaceflight, Inc. SHERPA secondary payload mission for deployment into a 450 x 720 km 98 degree inclined elliptical orbit on the SpaceX Falcon 9 Formosat-5 launch.
- All Planet Flock 2c satellites shall have onboard GPS with position determination accuracy of less than 20 meters.

⁵ A conjunction alert shall trigger the position data collection and exchange requirements set forth in this Agreement if the resulting probability of collision exceeds 1:10,000 (calculated using Alfano’s method). In that event, the parties shall collect and exchange GPS samples until the Probability of Collision (PoC) is reduced below this threshold, or the time of closest approach has passed, and each party will exchange the most recent ephemerides based on GPS-derived position estimates with each other via the SDA, or by an alternative mutually agreed method of direct correspondence.

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Page 3 of 3**

Please direct any questions regarding this letter to the undersigned.

Respectfully submitted,



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