

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Planet Labs Inc.)	File No. SAT-MOD-20150802-00053
)	Call Sign S2912
)	
Application for Modification of its)	
Authorization to Operate a)	
Non-Geostationary (“NGSO”) Earth)	
Imagery Satellite System)	

WITHDRAWAL OF PETITION

ORBCOMM License Corp. (“ORBCOMM”), pursuant to Section 25.154 of the Commission's Rules, as explained below, hereby withdraws its Petition seeking to dismiss, deny, or hold in abeyance Planet Labs' above-captioned application to modify its FCC space segment license to launch and operate a constellation of non-geostationary earth imagery satellites (the “Planet Labs Application”). ORBCOMM filed its Petition because the Planet Labs Application requested authority to deploy an indeterminate number of satellites into an orbit intersecting with ORBCOMM’s non-geostationary satellite constellation, creating legitimate concerns about potential collisions. After extensive supplementation of the Planet Labs Application record and substantial efforts by both parties, Planet Labs and ORBCOMM have reached an agreement, including requested license conditions (being filed separately), that mitigates ORBCOMM’s concerns so that it can withdraw its objection to grant of the Planet Labs Application.

Even though it is removing its objection to grant of the Planet Labs Application, ORBCOMM remains concerned about any increased risks of collision and debris hazards that may affect ORBCOMM’s satellite system. Of specific relevance to the Planet Labs Application

and related proceedings is the need to address mission abort criteria in the event of a SpaceX Formosat-5 launch mission anomaly that precludes lowering the Falcon 9 2d stage from the intended primary Formosat-5 720 km circular release orbit to the specified 450 x 720 km 98 degree inclined release orbit for Spaceflight, Inc.'s proposed SHERPA secondary satellite payload deployment mission (the "SHERPA mission"). However, ORBCOMM recognizes that Planet Labs may not have sufficient capability to unilaterally specify or require abort criteria relating to the SHERPA mission. Accordingly, ORBCOMM urges the Commission to adopt appropriate conditions on licenses relating to the SHERPA mission to clearly specify abort criteria; *both* for SHERPA separation from the Falcon 9 second stage, and for release of the SHERPA mission secondary payload satellites.

ORBCOMM also notes that its agreement with Planet Labs does not reach consensus on a proper methodology for quantifying the probabilistic risk of collision risks and debris hazards affecting ORBCOMM's satellites that may arise from the SHERPA mission and deployment of the 56 Planet Labs satellites in their specified elliptical orbit. Nonetheless, as a result of the agreement reached between ORBCOMM and Planet Labs, ORBCOMM hereby withdraws its Petition seeking to dismiss, deny, or hold in abeyance the Planet Labs Application.

Respectfully submitted,



Walter H. Sonnenfeldt, Esq.
Regulatory Counsel
ORBCOMM License Corp. &
Vice President, Regulatory Affairs
ORBCOMM Inc.
Direct Tel: (585) 461-3018
E-Mail: sonnenfeldt.walter@orbcomm.com

September 14, 2016

CERTIFICATE OF SERVICE

I, Walter H. Sonnenfeldt, hereby certify that on this 14th day of September, 2016, I served a true and correct copy of the foregoing Petition to Dismiss, Deny or Hold in Abeyance of ORBCOMM License Corp. via first-class postage prepaid mail upon the following:

Michael Safyan
Planet Labs Inc.
346 9th St.
San Francisco, CA 94103

A handwritten signature in blue ink, appearing to read "Walter H. Sonnenfeldt", is written over a horizontal line.

Walter H. Sonnenfeldt