



Federal Communications Commission
Washington, D.C. 20554

June 25, 2020

Mr. Shiva Goel
Harris, Wiltshire & Grannis LLP
1919 M Street NW
Suite 800
Washington, DC 20036

Re: Swarm Technologies, Inc.
IBFS File Nos. SAT-MOD-20200501-00040 and SAT-AMD-20200504-
00041; Call Sign: S3041

Dear Mr. Goel:

In May 2020, Swarm Technologies Inc. filed the above referenced applications to modify its authorization to provide non-voice, non-geostationary (NVNG) mobile-satellite service (MSS) using the 399.9-400.05 MHz and 400.15-401 MHz frequency bands.¹ To assist in the Satellite Division's review of Swarm's applications, please provide the information requested below.

1. On page 2 of Swarm's orbital debris assessment report filed in both SAT-MOD-20200501-00040 and SAT-AMD-20200504-00041, tables providing the allocation of altitudes and orbital inclinations for the satellite constellation are included. The information provided regarding the number of satellites per plane is not consistent with the accompanying Schedule S reports. Please clarify applicable altitudes and orbital inclinations for the Swarm satellites.
2. Pursuant to section 25.114(d)(14)(3) of the Commission's rules, please provide information regarding the station-keeping tolerances for the Swarm satellites. 47 CFR § 25.114(d)(14)(3).

The requested information must be submitted no later than **July 25, 2020**. Failure to do so may result in the dismissal of Swarm's applications pursuant to Section 25.112(c) of the Commission's rules, 47 CFR § 25.112(c).

Sincerely,

/s/ Jose P. Albuquerque

Jose P. Albuquerque
Chief, Satellite Division
International Bureau

¹ Swarm Technology Inc., Memorandum Opinion, Order and Authorization, DA 19-1044 (Int'l Bur. Oct. 17, 2019).