



Federal Communications Commission
Washington, D.C. 20554

July 21, 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 137-138 MHz and 148-150 MHz bands.¹ As a follow up to our June 25, 2020 letter we request the following additional information regarding Swarm's orbital debris mitigation plan to assist the Satellite Division in its processing of Swarm's applications:

1. Please provide the specific impulse of the spacecraft's propulsion system.
2. What is the number of expected conjunctions requiring a maneuver, per spacecraft, over the course of its orbital lifetime?
3. What is the propellant budgeting for the force required per such conjunction to clear the risk? Is there enough propellant to cover the estimated number of required maneuvers over the lifetime of the spacecraft? If not, are there any additional capabilities or plans to further reduce collision risk?
4. Please address whether the propellant system proposed is sufficiently capable to reduce conjunction risk. Include in your answer a discussion of the criteria, such as probability of collision that will be applied in triggering a maneuver, the extent to which the system is capable of substantially reducing that risk, any criteria used to determine whether a reduction is substantial, and an indication of the amount of time required prior to the forecasted conjunction when a maneuver must be initiated in order to meaningfully reduce risk.

The requested information must be submitted no later than **August 20, 2020**. Failure to do so may result in 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).