

29 October 2020

**Ex Parte**

Marlene H. Dortch  
Secretary, Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

*Re: Swarm Technologies, Inc.; IBFS File No. SAT-MOD-20200501-00040; Call Sign: S3041*

Dear Ms. Dortch:

On October 28, 2020 I spoke on the phone with Karl Kensinger, Acting Chief of the Satellite Division in the International Bureau, about the above-referenced application (the Application).

We discussed the possibility of Swarm launching in the near-term a fixed number of satellites equipped with an onboard propulsion system pursuant to the same radio frequency and orbital parameters (including apogee and perigee altitude) currently authorized under Swarm's October 17, 2019 space segment grant.<sup>1</sup> As described in the Application, the satellites would have a mass of approximately 0.60kg and would replace Ku-band radar retro reflectors with GPS antennas in order to accommodate the propulsion system within a 1/4U form factor.<sup>2</sup>

In particular, pending full consideration of the Application, Swarm seeks narrower authority to launch up to sixteen satellites equipped with propulsion, together with non-propulsion-equipped satellites, over the course of three launches, beginning with the launch of SpaceBEEs 60-75 currently scheduled for December 28, 2020. With appropriate authority from the Commission by the anticipated integration date of November 27, 2020, Swarm could include four propulsion-equipped satellites (SpaceBEEs 60-63) as part of that batch. For the subsequent two launches, which Swarm expects to occur during 2021, Swarm would identify which SpaceBEEs are propulsion-equipped prior to integration. Swarm anticipates a series of launches to follow the December 28, 2020 launch as it targets full commercial deployment of its VHF constellation by the middle of 2021.

Please do not hesitate to contact me with any questions.

Sincerely,



Shiva Goel  
*Counsel to Swarm Technologies*

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<sup>1</sup> *Application of Swarm Technologies, Inc.*, Memorandum Opinion, Order and Authorization, 34 FCC Rcd. 9469 (Int'l Bur. Oct. 17, 2019).

<sup>2</sup> *See Swarm Technologies, Inc., Application to Modify the Authorization for the Swarm NGSO Satellite System*, IBFS File No. SAT-MOD-20200501-00040 (filed May 1, 2020), at Narrative p.3 & Table 1; *id.* at 4-7.