

**Ex Parte**

435 N. Whisman Rd Ste 100  
Mountain View, CA 94043  
regulatory@swarm.space

February 25, 2021

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

**Re: ORBCOMM License Corp., IBFS File Nos. SAT-MOD-20070302-00041, SAT-MOD-20070531-00076 and SAT-AMD-20071116-00161, Call Sign: S2103; Swarm Technologies, Inc., IBFS File No. SAT-LOA-20181221-00094, SAT-MOD-20200501-00040, and SAT-AMD-20200504-00041, Call Sign S3041**

Dear Ms. Dortch:

On February 23, 2021, Ms. Annette Purves, Head of Market Access, and Mr. Kyle Wesson, Regulatory Engineer, of Swarm Technologies, Inc. (“Swarm”) spoke with Ms. Kimberly Baum of the International Bureau about ORBCOMM License Corporation’s obligation to cease operations outside its primary assignments and steps the Commission might take to ensure that ORBCOMM complies with that obligation.

We presented arguments consistent with our prior filings on the subject.<sup>1</sup>

We also discussed the need to ensure ORBCOMM’s compliance in the very near term. We explained that ORBCOMM’s non-compliance is delaying competitive entry in multiple international markets, including in CEPT and Brazil, and that requiring ORBCOMM to adhere to the terms of its license would only facilitate coordination discussions between the two companies.

---

<sup>1</sup> See Letters from Scott Blake Harris and Shiva Goel, Counsel to Swarm Technologies, Inc., to Karl Kensinger, Acting Chief, Satellite Division, International Bureau, IBFS File Nos. SAT-LOA-20181221-00094, SAT-MOD-20070302-00041, SAT-MOD-20070531-00076, and SAT-AMD-20071116-00161 (filed Oct. 16, 2020, Nov. 2, 2020 & Nov. 6, 2020).

Please do not hesitate to contact me with any questions.

Sincerely,

*Kyle Wesson*

Kyle Wesson, Ph.D.  
Lead Regulatory Engineer  
Swarm Technologies, Inc.

cc: Ms. Kimberly Baum (via E-Mail)  
*Federal Communications Commission, International Bureau*

Mr. Walter H. Sonnenfeldt, Esq. (via E-Mail)  
*Regulatory Counsel, ORBCOMM License Corp.*

Mr. Stephen L. Goodman (via E-Mail)  
*Counsel to ORBCOMM License Corp.*

Mr. Janek Kaucz (via E-Mail)  
*Spectrum & Regulatory Specialist, Myriota Pty. Ltd.*

Mr. Eric B. Graham (via E-Mail)  
*Counsel to Myriota Pty. Ltd.*