

Supplement

S2946; File No. SAT-MOD-20200603-00065
S3045; File No. SAT-MPL-20200618-00078

Spire Global, Inc. (“Spire”), applicant in the FCC File No. SAT-MOD-20200603-00065 and FCC File No. SAT-MPL-20200618-00078, submits this supplement to its applications. The modification application, FCC File No. SAT-MOD-20200603-00065, requests authority to (i) amend market access grant condition 4 and the license for 2020-2025 MHz use among all satellites; (ii) amend license condition 15 and the market access grant to allow 402-403 MHz use until Nov. 22, 2029; (iii) grant authority to employ inter-satellite links in 2025-2110 MHz and 2200-2290 MHz; (iv) approve the passive measurement of foreign GNSS signals for meteorological monitoring; (v) permit 6 kg (and not 4.5 kg) satellites; and (vi) license a hosted payload operating in the 8025-8325 MHz (space-to-Earth) and 9200-10550 MHz (Earth-to-space) bands.¹

As referenced in the Narrative to the modification application of S2946 and by extension to S3045, Spire states that it understands that it must receive Commission approval of a revised Spire orbital debris risk mitigation plan and ODAR before deploying over 100 satellites on orbit and that it will submit the materials separately.² This Supplement provides its updated ODAR and mitigation plan clarifying and expanding the information regarding the aggregate collision risk and is submitted to comply with Condition 4 of the license authorization S2946 and Condition 5 of the market access grant for S3045.

The Supplement also incorporates the new rules adopted by the Commission as a result of the rulemaking in IB Docket No. 18-313, *Mitigation of Orbital Debris in the New Space Age*, Report and Order and Further Notice of Proposed Rulemaking, FCC 20-54 (rel. April 24, 2020) as required in Condition 5 of license authorization S2946 and Condition 6 of the market access grant for S3045.

¹ The application for S3045, File No. SAT-MPL-20200618-00078, incorporates by reference all exhibits and information provided as part of File No. SAT-MOD-20200603-00065. Accordingly, Spire requests that this Supplement also be accepted for both applications.

² See Application of Spire Global, Inc., FCC File No. SAT-MOD-20200603-00065, Narrative, p. 15-16.