

Spire Global, Inc.

8000 Towers Crescent Drive, Suite 1225,
Vienna, VA 22182 United States
spire.com

October 8, 2020

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Spire Global, Inc., S2946, FCC File No. SAT-MOD-20200603-00065; S3045,
FCC file No. SAT-MPL-20200618-00078 (“Modification Applications”)

Dear Ms. Dortch:

Spire Global, Inc. (“Spire”) hereby requests expedited consideration and grant of portions of the above referenced modification applications as set forth herein.

In the Modification Applications, Spire requests that Condition 15 of the license and the market access grant be amended to allow operation in 402-403 MHz until November 22, 2029, instead of the current October 31, 2020 phase-out deadline. Spire is currently working with the U.S. government agencies on coordination of this request and would accept a condition as follows:

Operations in the 402.6-402.8 MHz band shall be limited to a single center frequency 402.8 with a single emission bandwidth of 15 kHz by October 31, 2022 and Spire will transition out of 402.6-402.8 MHz completely by October 31, 2025.

Spire also submitted on July 22, 2020, a Supplement to address the Commission condition to the license and market access grant that Spire receive Commission approval of a revised Spire orbital debris mitigation plan and ODAR before deploying over 100 satellites on orbit. Spire is anticipating that it will reach the benchmark of 100 satellites on orbit with its launch currently scheduled for November 6, 2020. Additionally, Spire’s immediate launch schedule through 2Q 2021 is currently as follows:

4 satellites in November 2020
8 satellites in December 2020
2 satellites in February 2021
4 satellites in June 2021



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Until the updated ODAR and orbital debris mitigation plan can be processed, Spire requests that the condition be amended to allow at least an additional 18 satellites on orbit to accommodate its current launch schedule.

Due to the upcoming deadlines relating to these issues in the above-referenced modification applications, Spire requests that the portion of the modification application relating to operation in 402-403 MHz be granted expeditiously and at least before October 31, 2020. Additionally, Spire requests that the condition relating to the updated ODAR and orbital debris mitigation plan be modified to allow at least 118 satellites on orbit, or an additional 18 satellites, before the updated ODAR and orbital debris mitigation plan is processed.

Please direct any questions regarding this letter to the undersigned.

Respectfully submitted,



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cc: Karl Kensinger, FCC (via email)