



Federal Communications Commission
Washington, D.C. 20554

April 22, 2021

Mr. Nicholas G. Spina
Manager of Launch and Regulatory Affairs
Kepler Communications Inc.
675 King Street West, #204
Toronto, ON Canada
MSV 1M9
Email: nspina@kepler.space

Re: Kepler Communications Inc., IBFS File Nos. SAT-MPL-20200904-00104; Call Sign: S2981

Dear Mr. Spina:

On March 10, 2021, the Commission sent a letter asking additional questions to facilitate its review of the above-referenced application filed by Kepler Communications Inc.

In your response, with regard to the final question, Kepler stated that it is unclear on what analysis should be provided. Kepler therefore requested that the Commission clarify its request.

We clarify the question as follows:

Please indicate whether Kepler has identified an action threshold for differential drag maneuvers taken for the purpose of collision risk mitigation, and, if so, please state the threshold, e.g., $1E-4$. Please provide an analysis, considering an array of typical conjunctions in the Kepler operational orbits, of whether high-risk events **will be** mitigated by at least one and one half orders of magnitude below that mitigation action threshold. If Kepler has not adopted such a threshold, please use a $1E-5$ threshold.

Put another way, for the subset of potential conjunctions in the Kepler operational orbit that could be considered “high-risk” events, will Kepler have the ability to mitigate those conjunctions by at least one and a half orders of magnitude below Kepler’s typical mitigation action threshold? If Kepler does not have a mitigation action threshold, please use a mitigation action threshold of $1E-5$ for purposes of this analysis.

The National Aeronautics and Space Administration CARA office has provided some guidance concerning this type of analysis and can provide typical conjunctions histories for the relevant orbital regime. See https://nodis3.gsfc.nasa.gov/OCE_docs/OCE_50.pdf

Please feel free to contact us if you have any further questions, and we ask that you please submit the requested information by **May 4, 2021**.

Sincerely,

Karl A. Kensinger

Karl A. Kensinger
Acting Chief, Satellite Division
International Bureau