



Federal Communications Commission
Washington, D.C. 20554

June 20, 2019

William M. Wiltshire
Harris, Wiltshire & Grannis LLP
1919 M Street, NW
Suite 800
Washington, DC 20036

Re: Myriota Pty Ltd
IBFS File No. SAT-PDR-20190328-00020
Call Sign: S3047

Dear Mr. Wiltshire:

On March 28, 2019, Myriota Pty Ltd filed the above-captioned Petition for Declaratory Ruling requesting U.S. market access for a non-voice, non-geostationary (NVNG) mobile-satellite service (MSS) system in the 399.9-400.05 MHz and 400.15-401 MHz frequency bands.¹ To assist in the Satellite Division's review of Myriota's petition, please provide the information requested below.²

1. Please specify the number of 3U and 6U satellites in Myriota's constellation.³
2. Myriota states that in the event a satellite is launched but fails, and remains in stowed configuration, it would have an expected orbital lifetime of 24.7 years.⁴ Given this relatively long orbital lifetime, please provide test or heritage data regarding the reliability of the deployment mechanism.
3. Myriota states that the 3U satellites can perform differential drag maneuvers for the purpose of collision avoidance.⁵ If possible, provide more detailed information regarding these maneuvers, *i.e.*, is collision avoidance the only function for which drag maneuvers will be used?
4. For post-mission disposal, explain if an increased drag is the only end-of-life configuration planned.⁶

¹ Section 25.137 of the Commission's rules specifies that a petition for declaratory ruling is the means to request U.S. market access through any type of non-U.S. licensed space station in any frequency band. Accordingly, we have changed Myriota's IBFS file number from a Letter of Intent (LOI) to a Petition for Declaratory Ruling (PDR) (Myriota Petition).

² 47 CFR § 25.111(a).

³ Myriota Pty Ltd, IBFS File No. SAT-PDR-20190328-00020 (Myriota Petition), Attachment A at 2.

⁴ *Id.* at 21.


⁵ Myriota Petition, Narrative at 4.

⁶ Myriota Petition, Attachment A at 20.

5. For its 6U satellites, Myriota specifies that added propulsion will be used to conduct orbital station keeping, plane phasing, collision avoidance and de-orbit maneuvers.⁷ Please state if there are any other planned uses and provide, if possible, additional information regarding the propulsion system on the 6U satellites including, for example, what propulsive liquid is being used, the possibility of persistent droplets, and any prior use in other spacecraft.
6. If available, provide additional information regarding how the 6U satellites will impact Myriota's orbital debris mitigation calculations.
7. Myriota's orbital debris mitigation plan does not include the aggregate collision risk for the constellation. Please provide this information.

The requested information must be submitted no later than **July 20, 2019**. Failure to do so may result in the dismissal of Myriota's Petition pursuant to Section 25.112(c) of the Commission's rules, 47 CFR § 25.112(c).

Sincerely,


Jose P. Albuquerque
Chief, Satellite Division
International Bureau

⁷ *Id.* at 2.