



FORD SMART MOBILITY

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Donald J. Lough
dlough@ford.com

Ford Smart Mobility, LLC
One American Road
Dearborn, Michigan 48126

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VIA EMAIL

Chairman Ajit Pai
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Swarm Technologies Part 25 Authorization Application No. SAT-PDR-20200228-00021

Dear Chairman Pai:

On behalf of Ford Motor Company, Ford Smart Mobility LLC and Autonomic, LLC (“Ford”), I am writing in support of Swarm Technologies’ (“Swarm”) petition for declaratory ruling seeking market access for a non-voice, non-geostationary satellite constellation in UHF frequencies. Swarm is a critical Ford technology partner that is capable of providing the “anywhere and everywhere” transmission medium for the connected vehicles of the future. Granting Swarm’s petition will help ensure that Ford has the necessary coverage and throughput to serve connected vehicles even in the most remote locations, both in the United States and globally. Granting Swarm’s petition serves the United States public interest by ensuring that an American automaker and American satellite manufacturer and operator enjoy a level playing field in the intensely competitive and dynamic international connected vehicle ecosystem.

Ford Motor Company is an American multinational automaker founded in 1903 that produces millions of vehicles annually and currently employs over 100,000 people in the US and 200,000 people worldwide. Ford has worked tirelessly to become the industry's most trusted mobility company. Ford helps people to move more safely, confidently, and freely anywhere in the world. Ford’s success is based significantly on our commitment to innovation, both our own and through the partners with whom we work. Our partnership with Swarm highlights this commitment to innovation, through satellite services that serve customer safety and experience.

In March 2019, Ford urged the FCC to grant Swarm authority to launch and operate a global narrowband satellite constellation employing VHF frequencies. Ford explained that ubiquitous network coverage is essential to the future of connected transportation, which requires critical telematics and emergency data relay communications from anywhere on Earth. We further elaborated that Swarm’s ability to rapidly and cost-effectively deploy its satellite

constellation would offer Ford the ideal transmission medium needed to ensure the ubiquitous network coverage required for connected transportation.

In 2020, Ford remains committed to developing the connected vehicle of the future, and we are excited to see Swarm rapidly launching its VHF constellation. They will soon launch 12 commercial satellites, and Swarm has committed to launch over 60 commercial satellites this year, which will begin supporting customers like Ford with data connectivity, allowing us to expand our reach at an unprecedented scale.

Ford's ability to develop the connected vehicle of the future, however, must not be constrained by a lack of throughput. Accordingly, Ford urges the Commission to ensure that Swarm obtains adequate access to UHF spectrum for its satellite services in the U.S. market. This spectrum will help support the growing need for capacity to support connectivity solutions for vehicles as the demand for safety, monitoring, and tracking increases. The transmission of connected vehicle data supporting emergency response (such as vehicle location and airbag deployment or impact sensor data), vehicle diagnostics, and location tracking are crucial to ensuring driver safety and cannot afford to be delayed due to lack of available throughput. Given these demands, restricting Swarm's NVNG network to VHF frequencies may create throughput constraints that seriously disadvantage Swarm, and by extension, Ford.

Just like Ford, Swarm is a American-based, high-tech manufacturer. Swarm's revolutionary 1/4U CubeSats are manufactured in the U.S., Swarm's ground stations are manufactured in the U.S., and Swarm's Network Operations Center and Headquarters are located in the U.S. Favorable action on Swarm's UHF petition ensures that both Ford and Swarm continue to enjoy a leadership position in developing the 21st century connected vehicle ecosystem.

Ford appreciates the Commission's commitment to promoting American connected vehicle and commercial space interests and looks forward to sharing further innovations with the Commission in the near future.

Respectfully submitted,

Donald J. Lough

Donald J. Lough
Assistant General Counsel and Secretary
Ford Smart Mobility LLC

DJL/ac

cc: Commissioner Michael O'Rielly (michael.orielly@fcc.gov)
Commissioner Brendan Carr (brendan.carr@fcc.gov)
Commissioner Jessica Rosenworcel (Jessica.rosenworcel@fcc.gov)
Commissioner Geoffrey Starks (Geoffrey.starks@fcc.gov)
Secretary Marlene H. Dortch (marlene.dortch@fcc.gov)