

# Morgan Lewis

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July 23, 2020

**Via IBFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Notice of Ex Parte Communication - IBFS File No. SAT-PDR-20200228-00021;  
Call Sign S3064**

Dear Ms. Dortch:

On July 21, 2020, Dr. Sara Spangelo, Chief Executive Officer and Dr. Kyle Wesson, Regulatory Engineer, of Swarm Technologies, Inc. (Swarm), along with Tim Bransford of Morgan, Lewis & Bockius LLP, met by conference call with William Davenport, Chief of Staff & Senior Legal Advisor for Wireless and International to Commissioner Geoffrey Starks to discuss the above-referenced petition for declaratory ruling for a constellation of Ultra High Frequency (UHF) Non-Voice, Non-Geostationary (NVNG) communications satellites.

During this conference call, Swarm discussed the company's rapid progress deploying its previously authorized commercial Very High Frequency (VHF) NVNG satellite constellation, how near-term spectrum capacity constraints will affect the company's ability to effectively serve its federal and commercial customers, and how these constraints necessitate the need for a complementary UHF satellite constellation. Swarm reaffirmed why the Commission should act on its UHF Petition concurrently with other participants in the FCC's UHF NVNG processing round. Swarm emphasized that it was the only pending UHF NVNG applicant planning to build and operate its constellation in the United States. Finally, Swarm stressed that exclusion from the instant processing round would materially harm the company by making Swarm the only NVNG system without access to UHF spectrum, while at the same time likely diluting Swarm's existing spectrum capacity through the Commission's ongoing VHF NVNG processing round.

To the extent you have questions or concerns, please feel free to contact the undersigned.

Very truly yours,

/s/

Timothy Bransford  
(Outside Counsel to Swarm Technologies, Inc.)

cc (via email):  
William Davenport

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