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September 28, 2020

**Via IBFS**

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

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

Dear Ms. Dortch:

On September 24, 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 the following personnel from the Federal Communications Commission’s International Bureau, Satellite Division to discuss the above-referenced petition for declaratory ruling (UHF Petition) seeking United States market access for a constellation of Ultra High Frequency (UHF) Non-Voice, Non-Geostationary (NVNG) communications satellites.

- Karl Kensinger, Acting Chief
- Jay Whaley, Acting Chief, Satellite Policy Branch
- Samuel Karty, Engineer, Satellite Engineering Branch
- Alyssa Roberts, Attorney, Satellite Policy Branch

During this conference call, Swarm discussed the company’s recent successful launch of their first 12 commercial satellites on September 2, 2020 and commencement of their 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.

Sincerely,

*Kyle Wesson*

Kyle Wesson, Ph.D.  
Regulatory Engineer  
Swarm Technologies, Inc.

cc (via email):  
Karl Kensinger  
Jay Whaley  
Samuel Karty  
Alyssa Roberts