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BY ELECTRONIC FILING

Mr. Jose P. Albuquerque
Chief, Satellite Division
International Bureau
Federal Communications Commission
Washington, D.C. 20554

Re: Spaceflight, Inc.
Request for Special Temporary Authority
IBFS File No. SAT-STA-20150821-00060

Dear Mr. Albuquerque:

We noted in our November 2 reply to the Bureau's request for additional technical information relating to Spaceflight's above-referenced SHERPA mission that Spaceflight, Inc. ("Spaceflight") had used the NASA DAS software package for the preparation of its orbital debris assessment. In addition, we noted that Spaceflight would be exploring the practicality of using newer software packages based on higher fidelity methods as a means of preparing an orbital debris assessment that may result in conclusions that would bring the potential for casualty risk to closer to a zero probability.

This letter serves to update you on Spaceflight's efforts.

Relating to the ORSAT software utilized by NASA, we have been informed that NASA is unable to make that software available to a commercial operator as it is a NASA-proprietary product.

Relating to the DRAMA software available to the public from the European Space Agency, Spaceflight engineers have determined that the software is fundamentally more limited than the DAS software. In particular, the software is incompatible with the SHERPA mission because it is incapable of modeling a hollow cylinder, as the SHERPA vehicle is, and instead limits modeling to a solid cylinder, the input of which would result in an inaccurate orbital debris assessment.

Given the unavailability or limitations of the two modeling software options suggested to us, we believe that the assessment generated by the NASA DAS software remains the most accurate model for determining the potential for casualty risk.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jonathan L. Wiener". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jonathan L. Wiener
Counsel to Spaceflight, Inc.

cc: Indra Hornsby