



VIA ELECTRONIC MAIL

August 25, 2020

Momentum Inc.  
3050 Kenneth Street  
Santa Clara, CA 95054

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

RE: Update, Momentum Inc., IBFS File NO: SAT-STA-20200609-0068

Dear Mr. Albuquerque:

Please find below the Momentum Inc. ("Momentum") updates in reply to the August 21, 2020 conversation between Merissa Velez, Samuel Karty, and Momentum Inc. regarding follow on questions to our August 14, 2020 Commission Request Responses ("Responses"). By this letter, and the Revised Orbital Debris Assessment Report ("ODAR"), attached here as Exhibit 1, Momentum intends to address slight adjustments to items 4.5-1 and 4.7-1 in the ODAR submitted as Exhibit 2 to our August 14, 2020 Responses.

Regarding item 4.5-1, the revised ODAR attached here as Exhibit 1 addresses the need to demonstrate a hypothetical worst-case scenario collision risk. Specifically, the revised assessment shows the result in the suboptimal hypothetical case in which the VR-1 becomes non-operational upon reaching SSO at a 570km altitude. The resulting collision probably changed from 2.0503E-06 to 3.3830E-05.

Regarding Item 4.7-1, additional representative mass was added to better reflect the worst-case scenario physical mass for re-entry casualty risk. Specific to the deployer masses, as discussed, in lieu of providing constituent component level analyses, we opted to characterize the deployers and payload masses as uniform solid pieces of aluminum – which should result in a conservative assessment. Additionally, as requested, additional piece part-level data was included to reflect the proportionally small (less than 1kg) quantity of the worst-case high-melting temperature fasteners on the VR-1.

For both items, compliance with the associated requirements remains unchanged.

If you require any further information related to this application, please contact Philip Hover-Smoot at 415.254.1295 or via [phhs@momentus.space](mailto:phhs@momentus.space).



Very Respectfully,

*Philip Hampton Hover-Smoot*

Philip Hover-Smoot  
Associate General Counsel  
Chief Ethics & Compliance Officer  
Momentum Inc.

Attachments: 1) Exhibit 1 – Momentum ODAR Redux

CC: Merissa Velez