

Federal Communications Commission Washington, D.C. 20554

March 24, 2021

Mr. Philip Hover-Smoot Deputy General Counsel Chief Ethics & Compliance Officer Momentus Inc. 3050 Kenneth St. Santa Clara, CA 95054 philip.hover-smoot@momentus.space

> Re: Momentus, Inc., IBFS File No: SAT-STA-20210210-00020

Dear Mr. Hover-Smoot:

On February 10, 2021 Momentus, Inc. (Momentus) filed the above-captioned request for special temporary authority to operate its Vigoride-1 (VR-1) non-geostationary orbit spacecraft, designed to deploy five customer spacecraft in low-Earth orbit. To aid in the Commission's evaluation of Momentus's request, please respond to the following:¹

- 1. The material submitted on February 10 appears to omit various clarifications and corrections provided in connection with an earlier application. To the extent that this application is intended to seek authorization for the same operations as those described in IBFS File No. SAT-STA-20200609-00068, including the various clarifying statements provided as part of that file, please provide the relevant clarifications and any additional information that was filed with the prior VR-1 application.² This includes, but is not limited to, clarifying when the spacecraft will be deployed following orbital insertion.³
- 2. Please provide correct or provide further explanation concerning the provided antenna contours, as those filed with the application appear inconsistent with the other application information.
- 3. Please clarify which version of the NASA Debris Assessment Software (DAS) was used, and if any calculations are based on a past version of the DAS (other than 3.1.0), please provide updated calculations.
- 4. Please provide a worst-case calculation of large object collision risk for the VR-1 taking into account a scenario where the customer spacecraft remain onboard following orbit-raising.

¹ 47 CFR § 25.111(a).

² See, e.g., Letter to Jose P. Albuquerque, Chief, Satellite Division from Philip Hover-Smoot, Chief Ethics & Compliance Officer, Momentus Inc. (Aug. 14, 2020) (filed in IBFS File No. SAT-STA-20200609-00068 (withdrawn Dec. 16, 2020)).

³ See Momentus Inc., Application for Special Temporary Authority, Narrative & ODAR, IBFS File No. SAT-STA-20210210-00020. Page 3 of the Narrative states that deployment will occur: "prior to any orbit raising maneuvers," and page 5 of the Narrative states: "After separation from the launch vehicle, VR-1 will deploy Payloads 1 through 5." However, page 8 of the Narrative states: "VR-1 conducts orbit raising maneuvers to second orbitVR-1 deploys Payloads 1 through 5," and page 5 of the ODAR reflects this as well.

The requested information must be submitted no later than **April 2**, **2021**. Failure to do so may result in the dismissal of Momentus's application pursuant to section 25.112(c) of the Commission's rules, 47 CFR § 25.112(c).

Sincerely,

Karl A. Kensinger

Karl A. Kensinger Acting Chief, Satellite Division International Bureau

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