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March 4, 2020

Federal Communications Commission
445 12th St SW
Washington, DC 20554

Re: Waiver Request for Swarm Technologies, Inc. Fixed Gateway Earth Station License Applications

Dear Madam/Sir,

Swarm Technologies, Inc. ("Swarm") hereby seeks a waiver from the Federal Communications Commission ("FCC") Table of Frequency Allocations Footnote 5.218 regarding the frequency band 148.0–149.9 MHz, which reads as follows:

5.218 Additional allocation: the band 148-149.9 MHz is also allocated to the space operation service (Earth-to-space) on a primary basis, subject to agreement obtained under No. 9.21. The bandwidth of any individual transmission shall not exceed ± 25 kHz.

Specifically, Swarm seeks a waiver of the ± 25 kHz bandwidth limitation on any individual transmission in the frequency band 148.0–149.9 MHz for the following fixed gateway earth stations:

Mountain View, California

- File No. SES-LIC-20190806-01029; Call Sign: E190610
- File No. SES-STA-20191112-01480; Call Sign: E190610

Wailuku, Hawaii

- File No. SES-LIC-20191022-01365; Call Sign: E190859

Sussex, New Jersey

- File No. SES-LIC-20191022-01364; Call Sign: E190858
- File No. SES-STA-20191112-01479; Call Sign: E190858

Brewster, Washington

- File No. SES-LIC-20191022-01367; Call Sign: E190861
- File No. SES-STA-20191112-01481; Call Sign: E190861

Piti, Guam

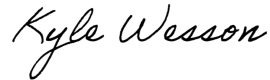
- File No. SES-LIC-20191206-01665; Call Sign: E191406

Swarm seeks a waiver granting up to 250 kHz necessary bandwidth for any individual transmission in the frequency band 148.0–149.9 MHz for (a) routine mobile satellite service (“MSS”) commercial operations, signal testing, and monitoring purposes; and, for (b) supporting U.S. government sponsored and approved contracts.

Swarm notes that the effective isotropic radiated power (“EIRP”) density for emissions with bandwidths wider than ± 25 kHz would be equal to or, in most cases, less than the EIRP density for emissions with narrower bandwidths, helping ensure that the probability of interference from Swarm’s fixed gateway earth stations to FIXED and MOBILE operations remains low in the 148.0–149.9 MHz band.

Swarm stands ready to provide any additional information necessary pursuant to this waiver request.

Sincerely,

A handwritten signature in cursive script that reads "Kyle Wesson".

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