

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
2019 World Radiocommunication Conference	)	IB Docket No. 16-185
Advisory Committee	)	

**COMMENTS OF SPIRE GLOBAL, INC.**

Spire Global, Inc. (“Spire”) submits these comments in response to the Public Notice issued by the Federal Communications Commission (“Commission”) International Bureau on October 3, 2018 in the above captioned proceeding.<sup>1</sup> The *PN* seeks comments on the draft recommendations provided by the World Radiocommunication Conference Advisory Committee, which are contained in Attachment A, and draft proposals provided by the National Telecommunication and Information Administration (“NTIA”), which are contained in Attachment B. The 2019 World Radiocommunication Conference (“WRC-19”) will consider these issues.

Spire’s comments are limited to proposals addressing WRC-19 Agenda Item 1.2 contained in Attachment B of the *PN*.

- In the 399.9-400.05 MHz band, Spire supports NTIA’s proposal that eirp limits should not be applicable in the 400.03-400.05 MHz portion.
- In the 401-403 MHz band, Spire urges that a U.S. position not be finalized without further discussion in IWG-3.

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<sup>1</sup> See *International Bureau Seeks Comment on Recommendations Approved by World Radiocommunication Conference Advisory Committee*, Public Notice, IB Docket No. 16-185, DA 18-1017 (rel. Oct. 3, 2018) (“*PN*”).

## **I. BACKGROUND**

Spire is an Earth Exploration-Satellite Service (“EESS”) and Meteorological-Satellite Service (“MetSat”) operator currently using the 401-403 MHz band to telecommand its satellites performing critical maritime, aviation, meteorological, and hosted payload services. To avoid potential interference concerns in the 401-403 MHz band, Spire has also applied to use the 399.9-400.05 MHz band; its request has been deferred.

## **II. FOR AGENDA ITEM 1.2, THE UNITED STATES SHOULD SUPPORT GROUND STATION LIMITS FOR THE 399.9-400.03 MHZ BAND ONLY AND SHOULD NOT ADOPT A U.S. POSITION FOR THE 401-403 MHZ BAND AT THIS TIME.**

Small satellite EESS/MetSat operators, such as Spire, require access to wideband spectrum to perform telecommand operations; however, there are only a limited number of UHF uplinks available: 399.9-400.05 MHz, 449.75-450.25 MHz, and 401-403 MHz. The United States has yet to allow Spire and other operators access to the 399.9-400.05 MHz band. The 449.75-450.25 MHz band has proven to be very noisy across various regions, and some U.S. Federal agencies are further limiting small satellite operators use of this band to the top 50 kHz. The 401-403 MHz band remains one of the free UHF uplink bands available to U.S. commercial small satellite operators.

For the 399.9-400.05 MHz band, Spire supports the NTIA proposal that ground station power limits should not be applicable in 400.03-400.05 MHz, allowing small satellite telecommand operations to continue without restriction indefinitely in that portion of the band.

For the 401-403 MHz band (one of the most populated small satellite bands as noted previously), Spire requests that careful IWG-3 consideration be given prior to the finalization of any U.S. position. The NTIA proposal was not provided until after the IWG-3 process was complete, and the related ITU WP 7B report, Document 7B/TEMP/172-E (“400 MHz Limits

Report”), was also not finalized until after the IWG-3 process was complete. As a result, the public, and IWG-3 in particular, has not considered the NTIA proposal nor the alternative mitigation techniques (*i.e.*, using certain portions of the 401-403 MHz band and utilizing GSO arc pointing avoidance) that now appear in the 400 MHz Limits Report, and the United States should not finalize its position at this time for this band.

### **III. CONCLUSION**

For the reasons provided herein, Spire urges the Commission to adopt the NTIA proposal for the 399.9-400.05 MHz band but not for the 401-403 MHz band.

Respectfully submitted,

/s/ George John

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