

June 2, 2018

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Subject:       *Ex Parte* Letter  
Streamlining Licensing Procedures for Small Satellites,  
IB Docket No. 18-86**

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this ex parte notice is being submitted to summarize comments made by Spire Global, Inc. ("Spire") at the Federal Communications Bar Association, International Telecommunications Committee's Brown Bag Lunch on the "FCC's Small Satellite Rulemaking" that was held on May 31, 2018 at the law offices of Sheppard, Mullin, Richter & Hampton LLP at 2099 Pennsylvania Avenue, NW, Washington, DC 20006.

Present at the meeting on behalf of the Federal Communications Commission, International Bureau, Satellite Division was Merissa Velez, Attorney Advisor.

The panel consisted of the following persons: the above-mentioned Merissa Velez; Jennifer Manner, Senior Vice President, Regulatory Affairs at EchoStar Corporation; Stephen Goodman, Counsel, Butzel Long; Tom Stroup, President, Satellite Industry Association; and George John, Legal & Regulatory Counsel, Spire. Ms. Manner moderated the discussion.

Mr. John lauded the Commission's initial efforts to streamline the licensing process for small satellites ("smallsats"). He also encouraged the Commission to expand the characteristics of smallsats that may qualify under the new proposed streamlined licensing process. Specifically, he suggested that propulsion-less satellites could be licensed under the new licensing process and deployed above 400 km (above the International Space Station) if they meet National Aeronautics and Space Administration's standards for orbital debris and above-station deployments.



Please contact me should you have any questions.

Sincerely,

/s/ George John

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cc: Merissa Velez