

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

In the Matter of	)	
	)	
Assessment and Collection of Regulatory Fees	)	MD Docket No. 18-175
for Fiscal Year 2018	)	

**JOINT COMMENTS OF  
ASTRO DIGITAL US, INC.; PLANET, INC.; AND SPIRE GLOBAL, INC.**

**I. INTRODUCTION**

Astro Digital US, Inc.; Planet, Inc.; and Spire Global, Inc. (collectively “Satellite Operators”) submit these comments in response to the above-captioned Report and Order and Notice of Proposed Rulemaking, which, among other things, seeks input on a creating a new small satellite regulatory fee category. The Commission should adopt its proposal to create a new small satellite regulatory fee category, which would have fees that are 1/20th of the regulatory fee currently applicable to NGSO systems, for FY 2019

**II. THE COMMISSION SHOULD ADOPT ITS PROPOSAL TO CREATE A NEW SMALL SATELLITE REGULATORY FEE CATEGORY.**

The Satellite Operators supports the Commission’s proposal to adopt a small satellite regulatory fee category with fees that are consistent with the ratio of the application fee proposed for small satellites to the application fee currently applicable to NGSO systems – 1/20<sup>th</sup> of the regulatory fee currently applicable to NGSO systems for FY 2019.<sup>1</sup> Streamlining the licensing procedures for small satellites includes reducing burdensome regulatory fees.

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<sup>1</sup> See *Assessment and Collection of Regulatory Fees for Fiscal Year 2018*, MD Docket No. 18-175, Report and Order and Notice of Proposed Rulemaking, FCC 18-65 ¶ 32 (rel. May 22, 2018) (“FY 2018”).

Many of the potential licensees under the proposed small satellite licensing process will be university students/faculties and early-stage companies attempting to quickly prove the viability of their small satellite technology to receive additional funding and move forward their operations. Without securing funding, these applicants will struggle mightily to pay large regulatory fees, maintain their licenses, and prove their technology viability. Additionally, it would not be sensible to reduce initial application fees to \$30,000<sup>2</sup> and to maintain an annual regulatory fee of \$135,350+ for those operators utilizing the proposed streamlined small satellite licensing process.

The Commission's adoption of its proposal to create a separate fee category for small satellites with reduced regulatory fees<sup>3</sup> would allow the Commission to meet its goals of reducing regulatory burdens and associated financial constraints for small satellites, while also allowing the agency to effectively advance scientific research and gather critical Earth observation data,<sup>4</sup> and is therefore in the public interest.

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<sup>2</sup> See *Streamlining Licensing Procedures for Small Satellites*, IB Docket No. 18-86, Notice of Proposed Rulemaking, FCC 18-44, ¶ 76 (rel. Apr. 17, 2018) (“*Smallsat NRPM*”).

<sup>3</sup> See *FY 2018 FNPRM* ¶ 32.

<sup>4</sup> See *Smallsat NPRM* ¶¶ 1, 21.

### III. CONCLUSION

For the reasons provided above, the Satellite Operators urge the Commission to adopt a new small satellite regulatory fee category, which would have fees that are 1/20th of the regulatory fee currently applicable to NGSO systems for FY 2019.

Respectfully submitted,

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