

September 20, 2022

**BY ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, N.E.  
Washington, DC 20554

Re: *Space Innovation, IB Docket, 22-271;*  
*Mitigating Orbital Debris in the New Space Age, IB Docket No. 18-313*

Dear Ms. Dortch:

On September 20, 2022, the undersigned representatives of WorldVu Satellites Limited (“OneWeb”), EchoStar Satellite Systems, LLC (“EchoStar”), Iridium Communications Inc., and SES Americom, Inc. and O3b Limited (collectively, “SES”) (collectively, the “Satellite Operators”) met with Shiva Goel of the Office of Commissioner Geoffrey Starks.

The Satellite Operators encouraged the Commission to make minor adjustments to language regarding the end of life mission requirements in the Mitigating Orbital Debris in the New Space Age draft second report and order.<sup>1</sup> Specifically, the Satellite Operators encouraged the Commission to: (1) adopt explicit language recognizing that operators may seek and obtain waivers of the five-year post-mission disposal rule for good cause shown in accordance with Commission rules; and (2) articulate objective criteria for evaluating these waiver requests.<sup>2</sup>

The Satellite Operators support the Commission’s overall actions in the mitigation of orbital debris and appreciate the strides it is taking to preserve our orbits.

Respectfully Submitted,

/s/ Blake Wiles

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/s/ Jennifer A. Manner

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<sup>1</sup> *Space Innovation*, Second Report and Order, IB Dockets 22-271 & 18-313, FCC-CIRC2209-01 (Aug. 8, 2022).

<sup>2</sup> See Letter of OneWeb, EchoStar Satellite Systems, LLC, Iridium Communications Inc., SES Americom, Inc. and O3b Limited, IB Dockets 18-313 and 22-271 (Sept. 20, 2022).

/s/ Suzanne Malloy

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