

February 2, 2018

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *The Boeing Company, IBFS File No. SAT-AMD-20171206-00167 and -00168*
WorldVu Satellites Limited, IBFS File No. SAT-AMD-20180104-00004

Dear Ms. Dortch:

This is to inform you that, on February 1, 2018, Patricia Cooper and undersigned counsel on behalf of Space Exploration Technologies Corp. (“SpaceX”) met with Rachael Bender, Wireless and International Advisor to Chairman Pai, to discuss the above referenced proceedings.

SpaceX began by expressing its appreciation of the Commission’s continuing efforts to drive forward the licensing of non-geostationary satellite orbit (“NGSO”) systems and updates to NGSO rules. Timely resolution of these issues will give NGSO applicants much greater certainty as they proceed with development of their systems and business plans.

However, SpaceX expressed concern that recent proposed amendments to pending applications in various NGSO processing rounds, filed many months after the applicable cut-off dates, threaten the integrity of the processing round regime and would introduce delay and uncertainty into the licensing process. Processing rounds ensure orderly and timely consideration of applications to reach a final decision that allows parties to make investment decisions and move forward with system implementation. Allowing out-of-time applications injects administrative uncertainty and delay that undermines the Commission’s goal of expedition and inhibits deployment of broadband infrastructure.

The Commission has clear rules to guard against manipulation of processing rounds. It has ample precedent from prior instances in which it has applied those rules to prevent speculation in and warehousing of valuable orbital/spectrum resources by, for example, prohibiting one party from having an attributable interest in more than one NGSO system in a frequency band, and to ensure that pending applications for which wholesale changes are proposed are relegated to a later processing round. SpaceX urged the Commission to apply these rules and precedents faithfully and expeditiously in order to remove any potential for uncertainty and delay they might otherwise inject into ongoing NGSO processing rounds.

Marlene H. Dortch
February 2, 2018
Page 2 of 2

Respectfully submitted,

A handwritten signature in blue ink that reads "William M. Wiltshire". The signature is written in a cursive style with a large, sweeping initial "W".

William M. Wiltshire
Counsel to SpaceX

cc: Rachael Bender
Bruce Olcott
Brian Weimer
Suzanne Malloy
Ryan Gardner