

Sallye Clark
202 434 7405
sclark@mintz.com



701 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20004
202 434 7300
mintz.com

October 28, 2020

Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, DC 20554

Re: AST&Science LLC - Amendment to Petition for Declaratory Ruling
Call Sign S3065; IBFS File Nos. SAT-PDR-20200413-00034 and
SAT-APL-20200727-00088

Dear Ms. Dortch:

Attached, please find an Amendment to the above-captioned applications from AST&Science LLC ("AST").

Please direct any questions to the undersigned.

Sincerely,

/s/ Sallye Clark
Sallye Clark
Attorney for AST&Science LLC

AST&Science
Amendment to Petition for Declaratory Ruling
SAT-PDR-20200413-00034; SAT-APL-20200727-00088

AST&Science LLC (“AST”) is filing this amendment to its Petition for Declaratory Ruling (“PDR”) for U.S. market access to revise its request for operating authority.

The SpaceMobile satellites for which AST requests U.S. market access are capable of operating in V-band frequencies and spectrum allocated to terrestrial services. By this amendment, AST requests authority to operate in the U.S. in the V-band (as detailed in its PDR and associated filings). AST is not requesting authority to operate in the spectrum allocated to terrestrial services, as all the provision of service to handsets on frequencies authorized for service to terrestrial users, such as mid-band frequencies governed by Parts 24 and/or 27 of the Federal Communications Commission’s (“Commission” or “FCC”) rules, will be done pursuant to lease agreements with terrestrial licensees that will permit AST to access a terrestrial licensee’s spectrum. Consistent with the Commission’s secondary market policies, an application or notification, as applicable, seeking FCC approval or acceptance of the leasing arrangement will be filed to reflect AST’s lease agreements for SpaceMobile operations, permitting use of frequencies licensed to the terrestrial licensee.

AST is not seeking to provide service on terrestrial frequencies independent of a terrestrial licensee partner, and AST is not seeking changes to the U.S. Table of Frequency Allocations (“Table of Allocations”). Additionally, by this amendment, AST is withdrawing its request for waiver of the Table of Allocations as it relates to terrestrial frequencies allocated to Parts 24 and 27.^{1/} By this amendment, AST additionally clarifies that its satellite system will not operate in the U.S. on the WCS (LTE Band 30) frequency band.

In this way, AST’s SpaceMobile system will enable terrestrial licensee partners to extend service to areas where terrestrial service is otherwise unavailable due to financial or environmental challenges to achieve 100% population and geographic coverage, in line with the Commission’s vision of not leaving any American behind in access to broadband cellular connectivity.

^{1/} Letter to Jose P. Albuquerque, Chief, Satellite Division, International Bureau, Federal Communications Commission from Sallye Clark, Attorney for AST&Science LLC, at 2, IBFS File No. SAT-PDR-20200413-00034; Call Sign S3065 (filed July 6, 2020).