

November 1, 2020

FILED ELECTRONICALLY VIA IBFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: AST & Science Application; SAT-PDR-20200413-00034/SAT-APL-20200727-00088

Dear Ms. Dortch:

I write to you regarding our support of AST & Science's (AST) Market Access Application, as amended. In February 2020 Rakuten became an investor in AST because we believe the AST's technology and business model could significantly improve 4G and 5G availability in the U.S. and around the world. Approval of the application will provide AST with access to the V-band spectrum needed for its constellation and will further the FCC's wireless leadership and support for innovative solutions to the rural coverage challenges of wireless broadband services.

Rakuten Mobile has made a significant commitment to the U.S. market through equity investment and collaboration with a number of innovative companies which we believe will all enable the United States to continue to be the leader in 5G technology development and deployments. AST's technology which will directly connect a low earth orbit (LEO) satellite constellation to any off-the-shelf 4G and 5G cellular device is a transformational technology that will help close the digital divide in areas where the economics of traditional terrestrial deployment are particularly challenging. Importantly, this will be achieved in partnership with mobile network operators (MNO) using the MNO's licensed spectrum, not the spectrum that is the subject of the application.

The FCC has been a global leader in wireless because it has embraced transformational technologies and worked diligently to promote service in unserved and underserved areas using inventive, cost-efficient means of deployment. In partnership with MNOs, AST's technology has the potential to significantly improve rural coverage and we support timely approval of their application by the FCC.

Sincerely,

Azita Arvani

GM, Rakuten Mobile Americas