

May 30, 2017

*Via Electronic Filing*

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

Re: *Notice of Ex Parte Communication, ET Docket No. 13-115, RM-11341, and IBFS File Nos. SAT-LOA-20161115-00118 and SAT-LOA-20170301-00027*

Dear Ms. Dortch:

This is to inform you that, on May 25, 2017, representatives of Space Exploration Technologies Corp. (“SpaceX”) met with FCC Chairman Ajit Pai and Matthew Berry, his Chief of Staff, in Hawthorne, California and discussed the above referenced proceedings. The following individuals were present at the meeting on behalf of SpaceX: Gwynne Shotwell, President; Tim Hughes, Senior Vice President; and Patricia Cooper, Vice President, Satellite Government Affairs.

During the meeting, SpaceX discussed its Falcon 9, Falcon Heavy, and Dragon Cargo and Crew technology, and encouraged the Commission to act in allocating spectrum resources for commercial space launch operations relative to the long-standing NPRM.<sup>1</sup> Such an allocation would be a significant step toward streamlining launch spectrum licensing in the future—an efficiency that will become even more important as the cadence of commercial launch and reentry activities continues to increase. SpaceX expressed its hope that this proceeding could be resolved in the near future to implement the allocations proposed and that, in the longer term, all spectrum needed for commercial launch activities could be allocated for that use.

SpaceX also discussed its plans to offer high-speed satellite broadband services, as represented in its applications for authority to operate non-geostationary orbit (“NGSO”) satellite systems in the Fixed-Satellite Service (“FSS”) bands of Ku-, Ka- and V- bands.<sup>2</sup> SpaceX discussed the opportunity for intelligent satellite broadband constellations to bridge the gap for tens of millions

---

<sup>1</sup> See *Amendment of Part 2 of the Commission’s Rules for Federal Earth Stations Communicating with Non-Federal Fixed Satellite Service Space Stations*, 28 FCC Rcd. 6698, ¶¶ 65-88 (2013).

<sup>2</sup> See IBFS File Nos. SAT-LOA-20161115-00118 and SAT-LOA-20170301-00027.

of Americans without access to broadband, while introducing needed competition for others served currently by only one provider. They outlined the effect of phased-array technology on beam-size and spectral efficiency, as well as the networking impact of satellite diversity. SpaceX also reiterated its belief that the Commission has the opportunity to act as a thought-leader for efficient and fair means of sharing spectrum among NGSO systems and establish incentives for spectrally efficient constellations and safe space operations. Careful consideration of these aspects in the pending Notice of Proposed Rulemaking<sup>3</sup> to update the Commission's Part 2 and 25 rules will create a proper regulatory framework for large constellations, which will redound to the benefit consumers throughout the U.S. and around the world.

Sincerely yours,



Patricia Cooper  
Vice President of Satellite Government Affairs

SPACE EXPLORATION TECHNOLOGIES CORP.  
1030 15<sup>th</sup> Street, N.W.  
Suite 220E  
Washington, DC 20005  
Tel: 202-649-2634  
Email: [Patricia.Cooper@spacex.com](mailto:Patricia.Cooper@spacex.com)

cc: Matthew Berry  
Rachael Bender

---

<sup>3</sup> See *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, 31 FCC Rcd. 13651 (2016).