

Federal Communications Commission Washington, D.C. 20554

February 26, 2019

William M. Wiltshire Paul Caritj Harris, Wiltshire & Grannis LLP 1919 M Street, N.W. Suite 800 Washington, DC 20036

Re: Space Exploration Holdings, LLC, IBFS File No. SAT-MOD-20181108-00083

(Call Signs S2983 and S3018)

Dear Messrs. Wiltshire and Caritj:

On November 8, 2018, Space Exploration Holdings, LLC (SpaceX) filed the above-captioned application for modification of its authority to construct, deploy, and operate a non-geostationary orbit (NGSO) fixed-satellite service system. To aid in the Commission's evaluation of SpaceX's application, please provide the following:

- 1. Please provide an estimate of the collision risk, using NASA Debris Assessment Software or another recognized estimation tool, for a single satellite, assuming a propulsion or other system failure that renders the satellite incapable of collision avoidance immediately following orbital injection. Please provide that estimate assuming a satellite in both a stowed and a fully deployed configuration.
- 2. Please indicate whether, as currently designed, the proposed satellites are capable of a controlled re-entry, i.e., re-entry specifically and reliably targeted at broad ocean areas, away from human populations.
- 3. Please provide any updates concerning the additional, high fidelity studies of casualty risk during re-entry mentioned at Application, Technical Information Exhibit, p. 47.
- 4. In the event a high fidelity study has not been completed:
 - a. Please state SpaceX's current plans with respect to the number of satellites that will carry each of the alternative components discussed at pages 45-46 of the Technical Information Exhibit.

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¹ 47 CFR § 25.111(a).

b. Please provide any additional information and analysis to support the choice of materials that will not demise upon re-entry.

SpaceX must file a letter providing this information by March 26, 2019. Failure to do so may result in the dismissal of SpaceX's application pursuant to Section 25.112(c) of the Commission's rules, 47 CFR § 25.112(c).

Sincerely,

Jose P. Albuquerque Chief, Satellite Division International Bureau