

April 20, 2020

**BY ELECTRONIC FILING**

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

Re: *Space Exploration Holdings, LLC, IBFS File No. SAT-MOD-20200417-00037*

Dear Ms. Dortch:

Pursuant to Sections 1.1200(a) and 1208 note 2 of the Commission's rules,<sup>1</sup> Space Exploration Holdings, LLC ("SpaceX") hereby requests that the Commission designate the above referenced proceeding as "permit but disclose" for purposes of the Commission's rules governing ex parte communications. The Commission or its staff may make such a designation where it determines that doing so will serve the public interest by facilitating the resolution of broad policy issues raised by an application. The Commission made such a determination with respect to the previous application in which SpaceX sought to modify its license for a non-geostationary orbit satellite system by lowering operational altitudes.<sup>2</sup> SpaceX submits that the Commission should reach the same conclusion with respect to this application as well, and redesignate the proceeding accordingly.

Sincerely,



William M. Wiltshire  
*Counsel to SpaceX*

cc: Jose Albuquerque  
John Janka

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<sup>1</sup> See 47 C.F.R. §§ 1.1200(a) and 1208 note 2.

<sup>2</sup> See Public Notice, 34 FCC Rcd. 1042 (IB 2019).