



HWG LLP
1919 M STREET NW
WASHINGTON, DC 20036
TEL: +1 202 730 1300 | HWGLAW.COM

William M. Wiltshire
direct dial: +1 202 730 1350
wwiltshire@hwglaw.com

August 18, 2022

BY ELECTRONIC FILING

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

Re: *Space Exploration Holdings, LLC, Call Signs S2983/S3018*

Dear Ms. Dortch:

In March 2018, the Commission authorized Space Exploration Holdings, LLC (“SpaceX”) to construct, deploy, and operate a non-geostationary orbit (“NGSO”) satellite system comprising 4,425 satellites for the provision high capacity, low latency broadband services around the world, including in areas underserved or completely unserved by terrestrial alternatives.¹ Just over one year later, SpaceX began operation of the initial Starlink space station in its authorized orbit in compliance with the terms and conditions of its authorization.² SpaceX has continued to launch satellites at high cadence and is currently offering service in 37 countries.

As confirmed by the attached declaration, SpaceX has now launched more than half of the maximum number of space stations authorized for service, placed them into their assigned orbits, and begun operating them in accordance with the station authorization. Accordingly, SpaceX has satisfied the first milestone for its NGSO system established in its authorization and Section 25.164(b)(1) of the Commission’s rules.³ SpaceX is the first operator authorized in the 2016 NGSO processing round to document this milestone, which it achieved more than eighteen months ahead of schedule.

¹ See *Space Exploration Holdings, LLC*, 33 FCC Rcd. 3391 (2018) (“*SpaceX Authorization Order*”).

² See Letter from Patricia Cooper to Marlene H. Dortch, IBFS File Nos. SAT-LOA-20161115-00118 and SAT-MOD-20181108-00083 (June 12, 2019).

³ See *SpaceX Authorization Order* ¶ 42.b (establishing March 29, 2024 as first milestone date); 47 C.F.R. § 25.164(b)(1). Although SpaceX has since modified its authorization to slightly decrease the number of authorized satellites, the Commission has made clear that a modification of the authorized number of satellites will not reduce a licensee’s milestone obligation after grant. See *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, 32 FCC Rcd. 7809, ¶ 67 n.149 (2017). Accordingly, SpaceX considers the 50% deployment requirement to apply to the 4,425 satellites initially authorized.

HWG LLP

Marlene H. Dortch
August 18, 2022
Page 2 of 2

As required under Section 25.165(d) of the Commission's rules, SpaceX requests that the Commission find that SpaceX has satisfied this milestone and is therefore relieved of its obligation to maintain a performance bond related to this NGSO system.⁴

If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,



William M. Wiltshire
Counsel to SpaceX

Attachment

cc: Thomas Sullivan
Karl Kensinger

⁴ See 47 C.F.R. § 25.165(d).

DECLARATION

I, Brett Tarnutzer, Director, Satellite Policy for Space Exploration Holdings, LLC (“SpaceX”) hereby certify that SpaceX has successfully launched more than 2,213 space stations authorized for service under call signs S2983 and S3018, placed them into their assigned orbits, and begun operating them in accordance with the station authorization.

A handwritten signature in black ink, reading "Brett Tarnutzer". The signature is written in a cursive, slightly slanted style.

Brett Tarnutzer
Director, Satellite Policy
Space Exploration Holdings, LLC

Date: August 18, 2022