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February 22, 2021

Via IBFS

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

Re: ***Notice of Ex Parte Communication - IBFS File Nos. SAT-LOA-20161115-00117 and SAT-MOD-20200526-00057; Call Sign S2982***

Dear Ms. Dortch:

On February 18, 2021, SpaceLink Corporation (SpaceLink) met by video conference with staff from the Federal Communications Commission's (FCC) International Bureau to discuss the Non-Geostationary Satellite (NGSO) system authorized pursuant to the above-referenced FCC Call Sign. The following individuals attended this meeting.

FCC Attendees

International Bureau Front Office	
Troy Tanner	Deputy Bureau Chief
Jennifer Gilsenan	Assistant Bureau Chief
Kathryn O'Brien	Chief of Staff
International Bureau, Satellite Division	
Karl Kensinger	Acting Division Chief
Kerry Murray	Deputy Division Chief
Merissa Velez	Policy Branch Chief
Joseph Hill	Engineer, Engineering Branch
Cindy Spiers	Legal Advisor, Policy Branch

SpaceLink Attendees

David Bettinger	Chief Executive Officer
Tony Colucci	Chief Strategy & Commercial Officer
Rob Singh	Chief Technical Officer

Larry Rubin	Chief Operating Officer
David Lihani	General Counsel
Larry Alder	SVP, Products and Services
David Nemeth	SVP, Systems Engineering
David Pattillo	VP, Spectrum Management
James Spicer	Principal Aerospace Engineer
Ulises Pin	Outside Counsel
Tim Bransford	Outside Counsel

During the meeting SpaceLink provided the FCC with an introduction to its new executive and engineering teams and discussed the attached presentation.

To the extent you have questions or concerns, please feel free to contact the undersigned.

Very truly yours,

/s/

Timothy Bransford
(Outside Counsel to SpaceLink Corporation)

cc (via email):
Troy Tanner
Jennifer Gilsenan
Kathryn O'Brien
Karl Kensinger
Kerry Murray
Merissa Velez
Joseph Hill
Cindy Spiers

Progress Update

18 February 2021

Agenda

SpaceLink introduction and overview	Dave Bettinger/Tony Colucci
SpaceLink system architecture	Rob Singh
Gateway site selection status	Dave Nemeth
System procurement status	Larry Rubin
Second FCC license MOD request	Dave Pattillo
FCC milestones	Dave Pattillo
Upcoming ITU filings	Dave Pattillo
Coordination update	Dave Pattillo
Streamlined client licensing	Dave Pattillo
Discussion	

The SpaceLink Team

David Bettinger
Chief Executive Officer

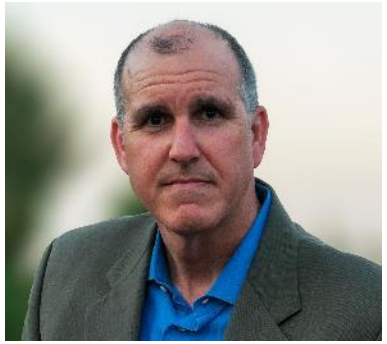
Tony Colucci
Chief Strategy & Commercial Officer

Rob Singh
Chief Technical Officer

Larry Rubin
Chief Operating Officer

Larry Alder
SVP, Products and Services

David Nemeth
SVP, Systems Engineering

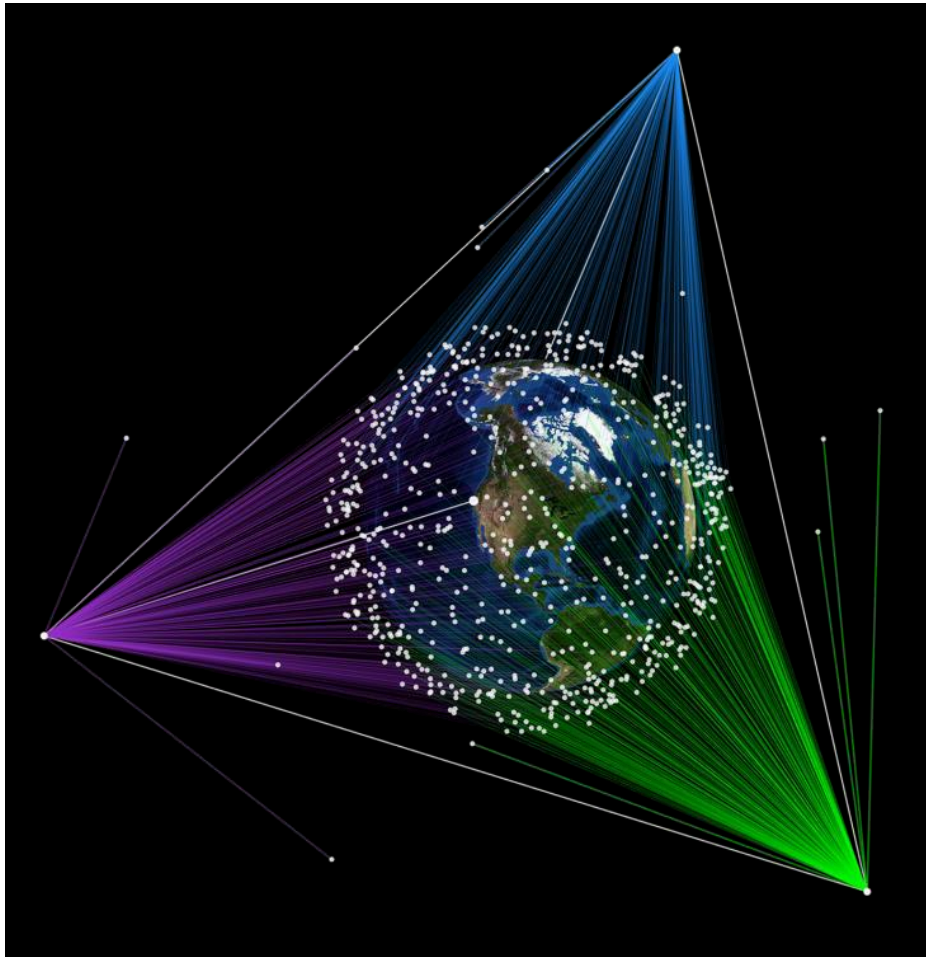


David Pattillo
VP, Spectrum Management

James Spicer
Principal Aerospace Engineer

Mission: Reliable, Continuous Communications

- The SpaceLink system will provide reliable, continuous, real-time, low-latency communications and data relay for spacecraft in LEO and other orbits
  - Will connect to gateway Earth stations and to end users via the Internet, cloud, or other secure links
  - Links use high data rate flight user terminals that operate in K/Ka-band and are optimized to customer requirements, including size, mass, power, and cost
- EOS has strong financial backing and ample spectrum to support current and future communications and data relay needs
- The Satellite Relay Network can be leveraged to support existing, planned and emerging missions in a commercial environment



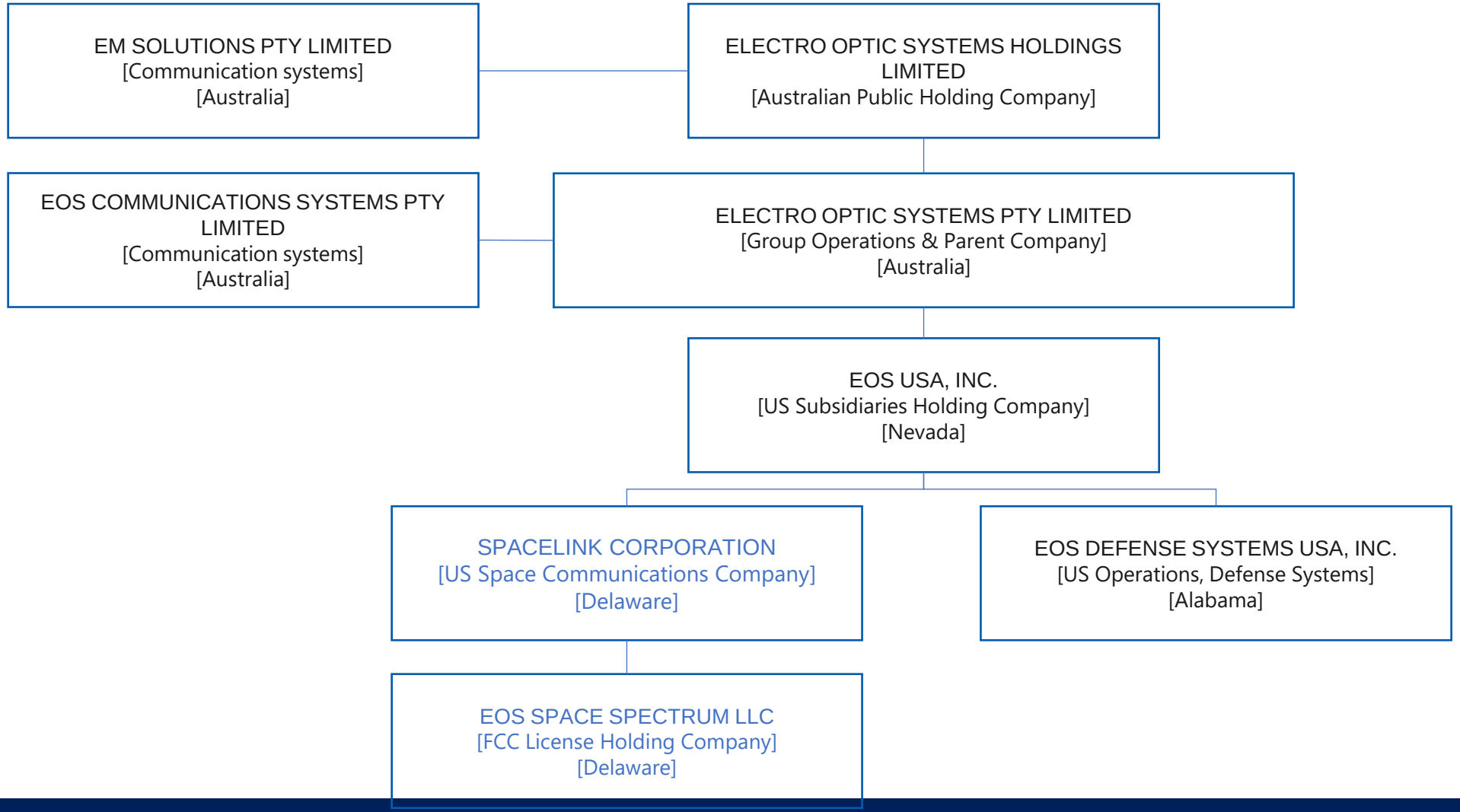
"Commercial TDRSS from MEO"

SpaceLink is a Subsidiary of EOS

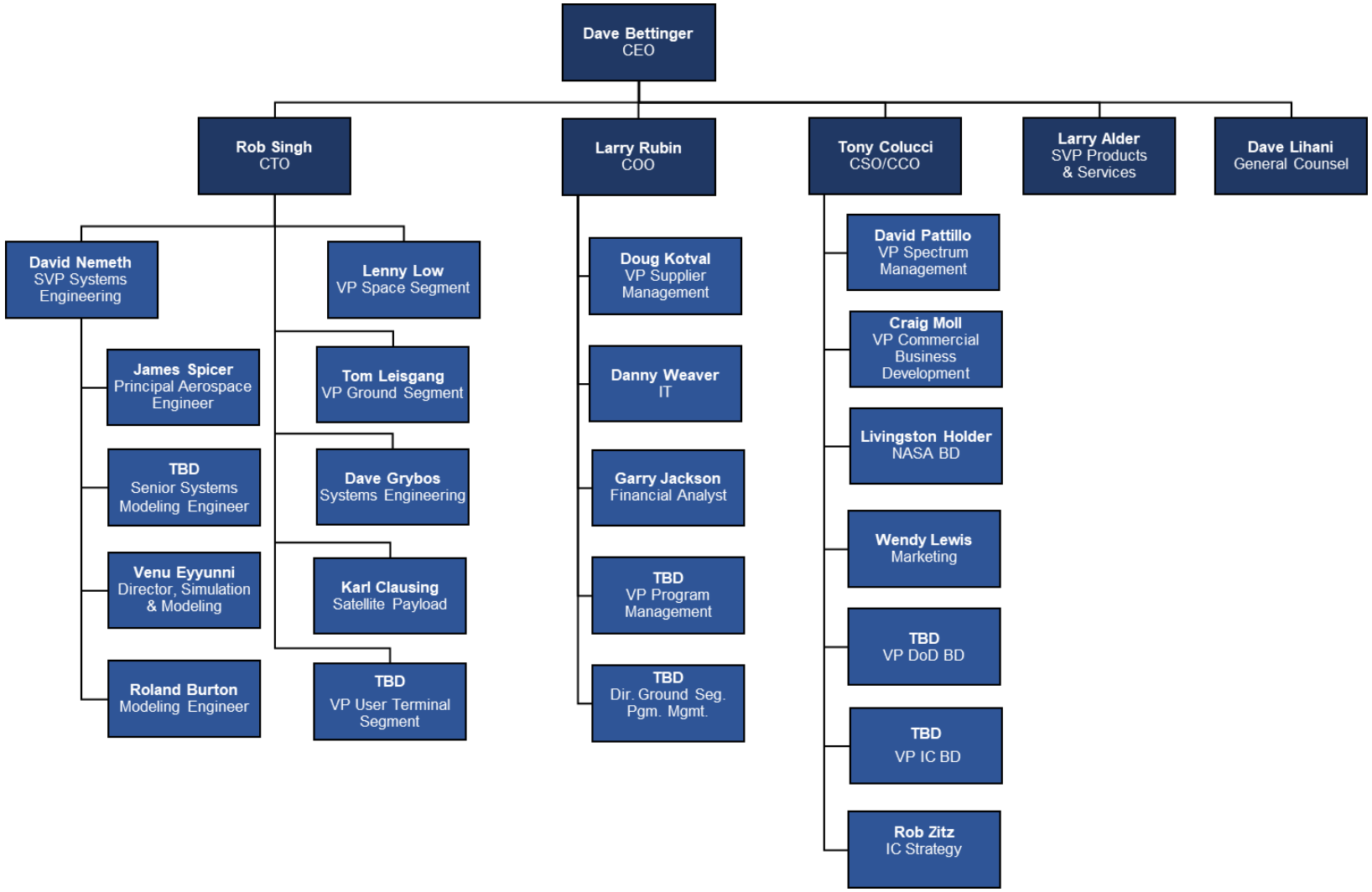
- Electro Optic Systems Pty Limited (EOS) is the leading Australian aerospace and defense company
  - Approaching $1B market capitalization
  - One of top 300 companies traded on Australian Stock Exchange
- EOS is building SpaceLink – an inter-satellite data relay system with global service coverage
- EOS has designed, manufactured, and exported advanced optical technology systems for 35 years and is a leader in space information and intelligence services, optical sensor units, and remote systems
- SpaceLink is strategic for EOS: a bridge to optical space comms
  - EOS has invested over $250M in optical comms technology
  - SpaceLink will incorporate EOS optical comms technology in future generations

EOS is Australia's largest home-grown defense company

SpaceLink is a US Company



SpaceLink Organization



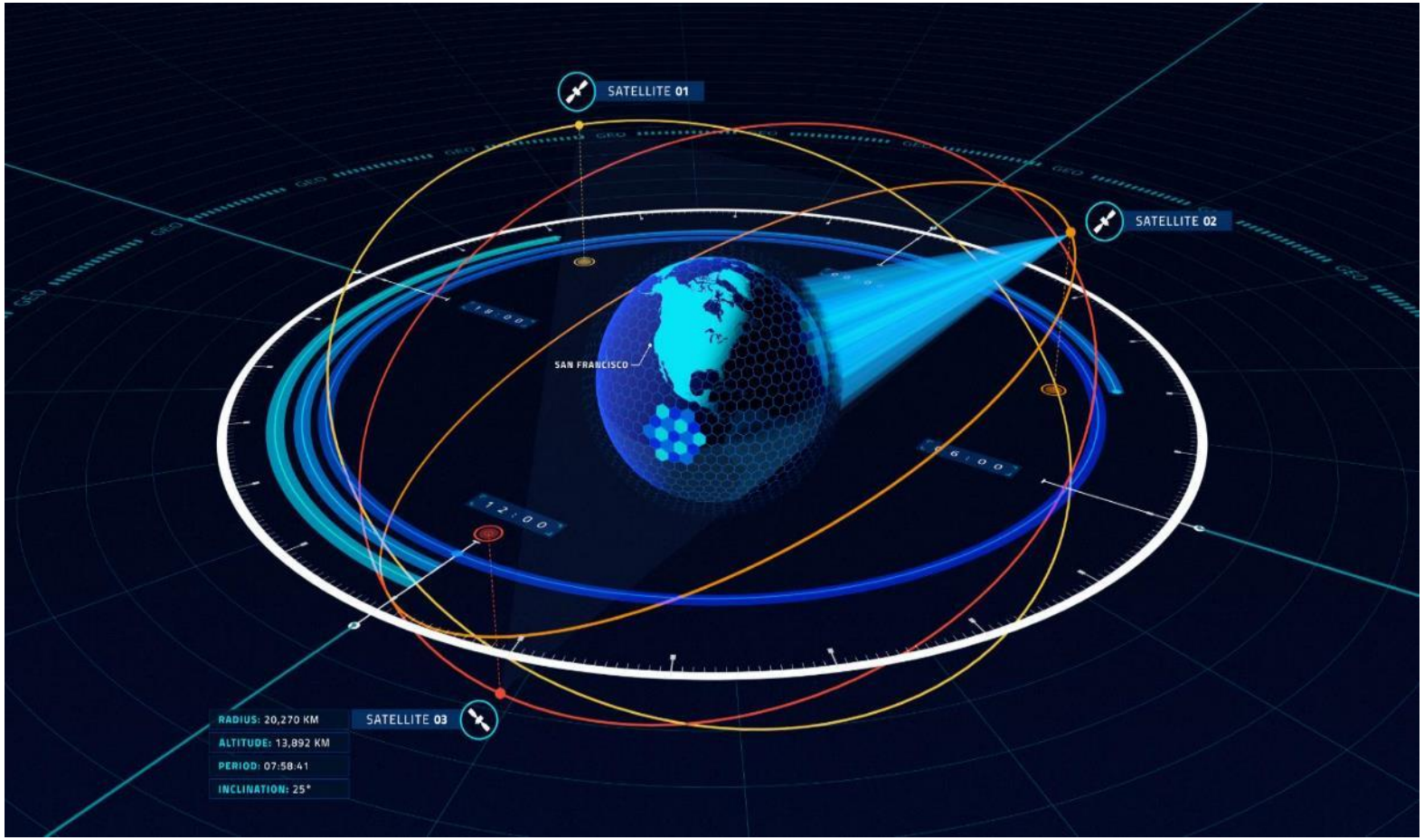
SpaceLink Timeline

2015	Audacy founded to create a commercial MEO relay service
2018	June – FCC granted Audacy license
2019	August – Audacy ceased operations due to lack of funding September – EOS sees synergy and begins acquisition effort December – Acquisition agreement signed
2020	March – FCC approved transfer of control of spectrum license May – CFIUS cleared EOSDS acquisition of Audacy business May – Acquisition of Audacy business closes September – SpaceLink Corporation formed
2024	SpaceLink enters service

Great support from the FCC and CFIUS

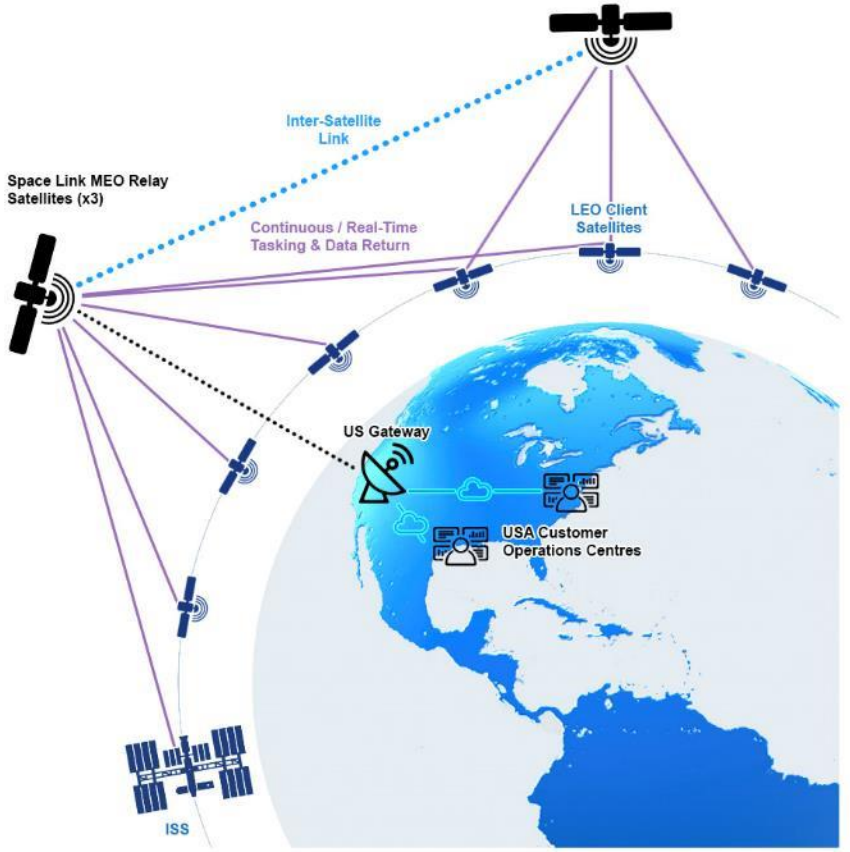
SpaceLink System Architecture

- SpaceLink – an inter-satellite data relay system with global service
  - Allows client space system operators to maximize use of their assets
- Three data relay satellites, plus an on-orbit spare, will be positioned in medium earth orbit (MEO) with global coverage and constant view to our ground gateway network
- SpaceLink will provide client satellites with reliable, continuous, real-time, high data rate, low latency relay connections to ground-based infrastructure



SpaceLink Architecture Elements

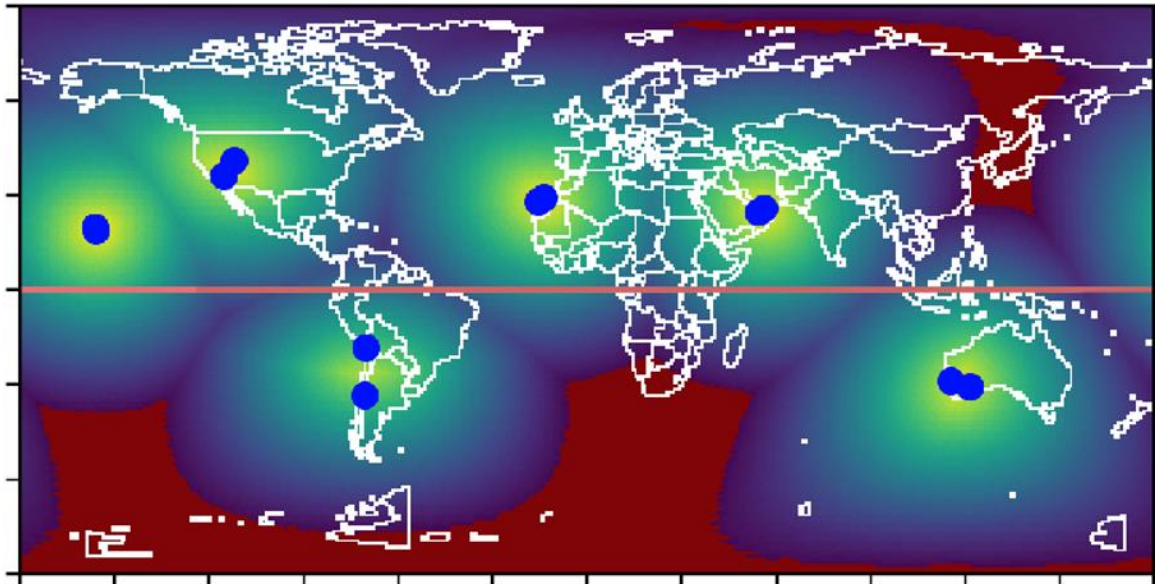
- Spectrum – 21+ GHz global commercial radio spectrum for intersatellite links to support communications relay deployment
- Satellites – relay communications node in space; 3 operational satellites deployed in MEO, with intersatellite links providing full coverage to clients
- Gateways – ground station network, deployed globally with sites including US, Australia, and Europe tied to U.S. Network Operations Center
- Client Terminals – user space flight radios and tracking antennas integrated with customers' LEO satellites
- Network & Software – cloud-based network management and signal processing, for secure and reliable communications



SpaceLink Gateway Sites

- Site Selection Criteria:
  - Relay satellites always have a gateway in sight
  - Site pairs for full rain and disaster diversity
  - Low rain areas for high link availability
  - Always have a satellite visible to a US site for in country traffic landing from anywhere
  - Fiber connectivity, access, politically friendly
- Selection status
  - Nominal site locations identified which meet criteria

Notional Gateway Locations



System Procurement Status

- Discussions held and on-going with potential suppliers of the system
  - Principal engagements are with large satellite prime contractors, as well as with smaller satellite bus and payload suppliers
  - Have opened discussions with all major commercial launch services, several smaller launchers, and Orbital Transfer Vehicle providers
  - User Terminal, Ground Segment, and Network Segment discussions are also on-going
- Top-level requirements and informal Requests for Information (RFIs) provided
  - To evaluate industry capability in general and suitability as suppliers specifically
  - Provides information for architecture trades and definition, including optimizing of satellite and orbital parameters
- Formal RFIs and Requests for Proposals are being drafted for issuance over the next several weeks and months
- Driving to be on contract in Q2 2021 for all architecture element segments

FCC Milestones

- On track to meet FCC milestone dates of June 2024 and June 2027
- New ITU filings being generated based on updated design
  - Requests for coordination (CR/C) for V and Ka bands
  - Advanced Publication Information (API) for inter-satellite K and Q/V bands
- New ITU filings will envelope operational and orbital characteristics
- This will provide new expiry/BIU dates in 2028

Second FCC License MOD

- Updated system design may require second license MOD request to Commission
- System design will be finalized by Q2 2021
- Plan to submit to Commission by summer
- Any design changes will be consistent with Sections 25.117 and 25.157 of the FCC's rules concerning modification to already authorized NGSO systems
- No additional processing round needed to accommodate proposed modifications

Upcoming ITU Filings

- New set of ITU filings being generated
- Will use ITU name USASAT-NGSO-2A
- Two CR/Cs:
  - V band (37.5-42, 47.2-50.2, 50.4-51.4 GHz)
  - Ka band (17.7-18.6, 18.8-20.2, 27.5-30 GHz)
- One API:
  - K band (22.55-23.55, 24.45-24.75, 32.3-33 GHz); E band (65-71 GHz)
- Plan to submit V band CR/C ASAP (March) to establish ITU priority
- Ka band requires epfd analysis and will take more time. Plan to submit by summer.
- New filings will have 2028 expiry date

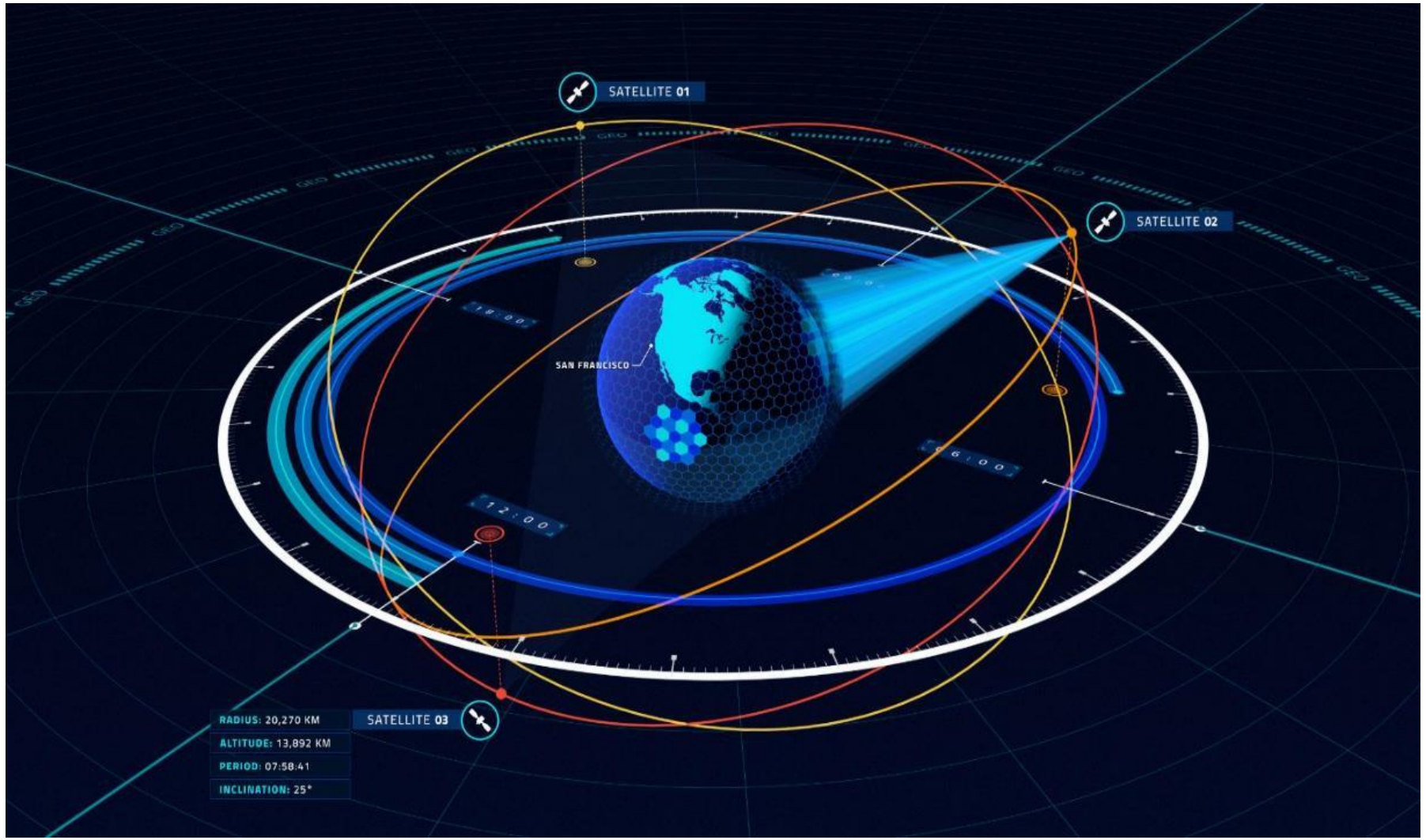
Coordination Update

- No coordination done to date
- USASAT-NGSO-2A filings will establish new coordination requirements
- Will start coordination in earnest after BR publication of CR/Cs and CR/Ds
- Ka 19.7-20.2 and 29.5-30 GHz will start this year to preserve ITU priority
- Recognize (USA) internal coordinations required with Ka/Ku first-round filers (9.12), V band filers (9.12), and DoD large Earth stations (9.7B)

Streamlined Client Licensing

- Highly desirable for SpaceLink clients to have streamlined FCC processing of license requests (Relay↔User)
- SpaceLink wants innovative clients to consider U.S. preferred administration for licensing
- SpaceLink desires to work with IB to define set of characteristics that can be qualified for routine processing
  - RF parameters to facilitate API and Notification filings
  - Form 312 and Schedule S submissions
  - Technical and narrative exhibits and other complementary materials
- What else can SpaceLink do to facilitate easier client licensing and help FCC maintain leadership position working with innovative commercial satellite systems?

Discussion



Thank You!