

May 27, 2020

**BY ELECTRONIC FILING**

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

Re: *Notice of Appearance, IBFS File No. SAT-MPL-20200526-00056*

Dear Ms. Dortch:

On May 26, 2020, Viasat, Inc. filed the above referenced application seeking authority to modify its current authorization for a non-geostationary orbit satellite system serving the U.S. market. Please be advised that Space Exploration Holdings, LLC (“SpaceX”) wishes to participate in any Commission proceeding regarding the disposition of this application. Accordingly, please accept this “written submission referencing and regarding such pending filing,” 47 C.F.R. § 1.1202(d)(1), and enroll SpaceX as a party for purposes of the Commission’s *ex parte* rules, 47 C.F.R. §§ 1.1200 *et seq.* We trust that no *ex parte* presentations or other communications will be allowed in this restricted proceeding unless the undersigned, on behalf of SpaceX, receives advance notice and an opportunity to be present. 47 C.F.R. § 1.1208.

This proceeding raises important public interest considerations about how the Commission will evaluate proposed modifications to the market access authorizations held by non-U.S. licensed operators of non-geostationary orbit constellations going forward, including the critical threshold issue of how changing a 20-satellite system into a 288-satellite system can be deemed a sufficiently minor modification to allow consideration outside of a processing round. Accordingly, SpaceX would not object to the Commission’s designating the *ex parte* status of this proceeding as “permit-but-disclose” under the Commission’s rules, 47 C.F.R. § 1.1206.

Respectfully submitted,



William M. Wiltshire  
*Counsel for SpaceX*

cc: John P. Janka\*  
Jose Albuquerque

\* Service via electronic mail due to COVID-19.